

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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| UNITED STATES OF AMERICA, |) | <u>I N D I C T M E N T</u> |
| Plaintiff, |) | 1:11CR0121 |
| v. |) | CASE NO. JUDGE EHOI |
| RAYSHAWN LIGON, |) | Title 21, § 846, United States Code |
| aka DIRTY RAY, |) | Title 21, §§ 841(a)(1), (b)(1)(A), (b)(1)(B) and (b)(1)(C), United States Code |
| LARRY NEAL, |) | Title 21, § 843(b), United States Code |
| BRAULIO DIAZ, |) | Title 18, §§ 922(g)(1) and 924, United States Code |
| aka TONY, |) | Title 18, § 1956(h), United States Code |
| DONTOYE KEVIN FEELINGS, |) | Title 18, § 1952(a)(3), United States Code |
| aka TYRONE DION PATRICK, |) | |
| aka ANTHONY, |) | |
| TRAVON WILLIAMS, |) | |
| aka LITTLE D, |) | |
| VAN HERRON, |) | |
| ERNEST HARRIS, |) | |
| DIVAUGHN LIGON, |) | |
| aka LOU, |) | |
| LEONARD COLE, |) | |
| aka SCOOTER, |) | |
| JULIUS CARSON, JR., |) | |
| aka OG, |) | |
| KYRON MARLIN, |) | |
| NIAKENA K. HEARD, |) | |
| aka KENTAE, |) | |
| IVAN HARRIS, |) | |
| aka MICHAEL FANNIN, |) | |
| TERENCE C. HESTER, |) | |
| PERRY AVERY, JR., |) | |

| | |
|--------------------|---|
| SHERTARRA CATRON, |) |
| aka TT, |) |
| JASON MORGAN, |) |
| aka BOOTY, |) |
| WILLIAM EFFORD, |) |
| EARL KING, |) |
| DARNELL HAYNES, |) |
| aka FU-FU, |) |
| MICHAEL FASON, |) |
| aka PT, |) |
| LEONARD YOUNG, |) |
| aka SNOOP, |) |
| JAMES HENRY, |) |
| aka HURK, |) |
| VINCENT PRICE, |) |
| JAMEL MCHANAY, |) |
| aka GANGSTER NATE, |) |
| STETSON WHITE, |) |
| aka KT, |) |
| RUBY SEAGRAVES, |) |
| TEKORA MADDEN, |) |
| aka TK, |) |
| RICARDO BRASHERS, |) |
| aka RICO, |) |
| VERONICA JORDAN, |) |
| |) |
| Defendants. |) |

COUNT 1

The Grand Jury charges:

Beginning at least as early as November 2009, and continuing through September 10, 2010, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Eastern Division, and elsewhere, RAYSHAWN LIGON, aka DIRTY RAY; LARRY NEAL; BRAULIO DIAZ, aka TONY; DONTYOYE KEVIN FEELINGS, aka TYRONE DION PATRICK, aka ANTHONY; TRAVON WILLIAMS, aka LITTLE D; VAN HERRON; ERNEST HARRIS; DIVAUGHN LIGON, aka LOU; LEONARD COLE, aka SCOOTER; JULIUS CARSON, JR., aka OG; KYRON MARLIN; NIAKENA K. HEARD, aka

KENTAE; IVAN HARRIS, aka MICHAEL FANNIN; TERENCE C. HESTER; PERRY AVERY, JR.; SHERTARRA CATRON, aka TT; JASON MORGAN, aka BOOTY; WILLIAM EFFORD; EARL KING; DARNELL HAYNES, aka FU-FU; MICHAEL FASON, aka PT; LEONARD YOUNG, aka SNOOP; JAMES HENRY, aka HURK; VINCENT PRICE; JAMEL McHANEY, aka GANGSTER NATE; STETSON WHITE, aka KT; RUBY SEAGRAVES, the defendants herein, and others known and unknown did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute at least one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, to possess with the intent to distribute and to distribute at least 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and to possess with the intent to distribute and to distribute at least 28 grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and (b)(1)(B).

MANNER AND MEANS OF THE CONSPIRACY

A. It was part of the conspiracy that LARRY NEAL, a resident of Chicago, Illinois, obtained amounts of heroin from

BRAULIO DIAZ, DONTOYE KEVIN FEELINGS and other various suppliers in Chicago, Illinois, California, Minnesota and elsewhere.

B. It was further part of the conspiracy that LARRY NEAL traveled to the Cleveland, Ohio area, where he sold amounts of heroin to RAYSHAWN LIGON and ERNEST HARRIS.

C. It was further part of the conspiracy that RAYSHAWN LIGON, at times when NEAL was unavailable, purchased amounts of heroin, cocaine and cocaine base ("crack") from TRAVON WILLIAMS, VAN HERRON, LEONARD COLE, KYRON MARLIN, NIAKENA K. HEARD, IVAN HARRIS, TERENCE C. HESTER and others in the greater Cleveland, Ohio area and elsewhere.

D. It was further part of the conspiracy that RAYSHAWN LIGON sold amounts of heroin, cocaine and cocaine base ("crack") to DIVAUGHN LIGON; LEONARD COLE; JULIUS CARSON, JR.; KYRON MARLIN; TERENCE C. HESTER; PERRY AVERY, JR.; SHERTARRA CATRON; JASON MORGAN; WILLIAM EFFORD; EARL KING; DARNELL HAYNES; MICHAEL FASON; LEONARD YOUNG; JAMES HENRY; VINCENT PRICE; JAMEL McHANEY; STETSON WHITE; RUBY SEAGRAVES, and others in the greater Cleveland, Ohio area and elsewhere for resale.

G. It was further part of the conspiracy that DIVAUGHN LIGON, JULIUS CARSON, JR., SHERTARRA CATRON, JASON MORGAN, PERRY AVERY, JR., and others met with customers and sold heroin and collected money, delivered heroin and money, processed heroin,

and stored heroin at the direction of and on behalf of RAYSHAWN LIGON.

OVERT ACTS

In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, the defendants and others performed overt acts including but not limited to the following:

1. On February 3, 2010, RAYSHAWN LIGON met with a person cooperating with law enforcement (hereinafter "Source 1") in the greater Cleveland, Ohio area. During this meeting, LIGON sold approximately 20 grams of heroin for \$2,000 to Source 1.
2. On February 22, 2010, Source 1 placed an outgoing telephone call to telephone number 216-244-9709, wherein Source 1 had a conversation with RAYSHAWN LIGON. Source 1 asked LIGON, "Can you meet me at the address 2000 (Source 1 wanted to purchase \$2,000 worth of heroin from LIGON)?" LIGON stated, "Yeah. . . I have to stop at the house and then come straight to you."
3. On February 22, 2010, RAYSHAWN LIGON met with Source 1 in the greater Cleveland, Ohio area. During this meeting, LIGON sold approximately 16 grams of purported heroin for \$2,000 to Source 1. Lab results later indicated that the heroin was fake.
4. On April 15, 2010, RAYSHAWN LIGON met with another person cooperating with law enforcement (hereinafter "Source 3") in the greater Cleveland, Ohio area. LIGON provided Source 3 with telephone number 216-244-9709 to contact LIGON for the

purpose of ordering and purchasing heroin from LIGON. During the meeting, LIGON told Source 3 that he (LIGON) could supply Source 3 with any amount of heroin Source 3 wanted to purchase.

5. On April 16, 2010, RAYSHAWN LIGON arrived at the prearranged meeting location driving a black Audi A8, bearing Ohio temporary tag S262486, which is registered to Jimmie (a person known to the Grand Jury), on Willowbrook in Reminderville, Ohio, on a 2009 Audi, four door. During the meeting, Source 3 entered LIGON's vehicle. Source 3 paid LIGON \$2,600 for approximately 28.5 grams of heroin. During the meeting, LIGON told Source 3, "Every time, I'm on deck for you . . . I'm ready for you anytime (LIGON can provide Source 3 with heroin anytime)."

6. On April 29, 2010, Source 3 called RAYSHAWN LIGON on the telephone. LIGON stated, "I'm right here on Empire (Avenue), the same spot... 24 right (24 grams of heroin)?" Source 3 replied, "Yup." LIGON stated, "I'm on my way." Approximately ten minutes later, LIGON arrived at a prearranged meeting location driving his black Audi A8. Source 3 entered LIGON's vehicle and gave LIGON \$2,400 for approximately 23.9 grams of heroin.

7. On May 25, 2010, Source 3 called RAYSHAWN LIGON on the telephone. Source 3 stated, "You in the mix (have heroin to sell), my little nigga just hit me (my drug customer wants to purchase heroin)?" LIGON replied, "Oh ok, what he say 24 (24

grams of heroin)?" Source 3 stated, "No, 28 (28 grams of heroin)." LIGON stated, "28 (grams of heroin)?" LIGON made arrangements to meet Source 3 later in the day to conduct the drug transaction. Later that day, Source 3 met with LIGON and gave LIGON \$2,800 for approximately 28 grams of heroin.

8. On June 9, 2010, at approximately 4:27 p.m., PERRY AVERY, JR. called RAYSHAWN LIGON on the telephone. Avery stated, "I need to bump into you, you know what I'm saying, so that I can put that (money) together right quick, I'm going to have this bitch going to Atlanta and order some shit (order/purchase a quantity of heroin) ahead of time so it can be cheaper." LIGON replied, "I'll meet you in the hood."

9. On June 10, 2010, at approximately 11:27 a.m., RAYSHAWN LIGON called Debbie LNU on the telephone. LIGON asked, "You just met my father (JULIUS CARSON, JR.)?" Debbie said, "Naw, he been there about ten minutes ago (CARSON dropped off a car for Debbie)." LIGON stated, "I left you dirty (driving with heroin) as hell, got some shit (heroin) in that car man, I forgot to get it out of there, it is in that armrest. Hell yes. It is a scale (digital drug scale) and some shit (heroin) in there man." Debbie asked, "What do you think I should, huh?" LIGON stated, "If you could meet him (CARSON) and drop it (heroin and scale) to him." Debbie asked, "Do you need it, need it?" LIGON replied, "Hell yeah, I got a nigga (drug customer) just called me for that

shit, that is three racks (\$3,000 worth of heroin), you see it? I'm about to have him (CARSON) meet you." Debbie replied, "Ok."

10. On June 10, 2010, at approximately 11:28 a.m., RAYSHAWN LIGON called JULIUS CARSON, JR. on the telephone. LIGON stated, "I need you to meet Debbie again she down on Superior and Euclid, though right now about to put some gas in, . . . call Debbie and meet her cause I left that shit (heroin) in that armrest thing, you know how that armrest thing is (hidden compartment)." CARSON replied, "Oh." LIGON stated, "I forgot to tell you and shit. Yeah, Bleed (heroin customer) just called me for that shit, that's three racks (\$3,000 worth of heroin), I need that." CARSON stated, "I'm funna hurry up, tell her to stay right there." LIGON said, "Alright, call her . . . Call Debbie. . ."

11. On June 10, 2010, at approximately 1:44 p.m., RAYSHAWN LIGON called VAN HERRON on the telephone. LIGON stated, ". . . I'm ready for ya and shit. I umm, 'bout to say I need like uh, 12 (grams of heroin), so I can hit this one play (make this sale)." HERRON asked, "Where you at?" LIGON replied, "I'm ah, uh, I'm on 55th (Street) right now." HERRON said, "Let's see, meet me, umm, where you usually be at." LIGON replied, "Alright." Approximately four minutes later, HERRON called LIGON and asked, "Do you say ten (grams of heroin) of them?" LIGON replied, "No, I need 12 at a time and bring the regular, might as well bring . . ." HERRON said, "Alright, here I come."

12. On June 10, 2010, at approximately 3:30 p.m., RAYSHAWN LIGON called VAN HERRON on the telephone. LIGON stated, "This right here it's um, 66 (grams of heroin), half and plus that 12 (grams of heroin) . . . 66 and a half." HERRON said, ". . . No, no, damn I forgot, I know what it is, it um, it should be, it was 80 (grams), but I took 12 (grams) out for your dude (LIGON's heroin customer). . ." LIGON said, "If you took the 12 (grams) out, it should've been 88 (grams total) but this (digital scale) says 67 (grams)." HERRON replied, "No, no, no, it was 80 (grams) altogether, but I took 12 (grams) out, I forgot, I forgot." LIGON said, "Ok, alright." HERRON stated, "I bring 20 (grams of heroin) back and make it, to make right, you feel me?"

13. On June 11, 2010, at approximately 2:21 p.m., PERRY AVERY, JR. called RAYSHAWN LIGON on the telephone. During the conversation, Avery stated, "You might want to make that move tomorrow (get heroin ready to sell). I am going to need like a 120 dollars (120 grams of heroin) from you man." LIGON replied, "Alright, you gonna have to call me a little later so I can make some money (prepare heroin) up old boy." Avery stated, "Alright, I was like telling and shit, I have everything else man (money from previous heroin sales) man." LIGON said, "Alright."

14. On June 11, 2010, at approximately 2:30 p.m., TRAVON WILLIAMS called RAYSHAWN LIGON on the telephone. During the conversation, WILLIAMS stated, "You know I'm on my way to Chicago

to fuck with my aunt and shit drop off my kids off." LIGON stated, "I'm calling my nigga (drug supplier in Chicago), you come back." WILLIAMS stated, "Tell him (Chicago drug supplier) to drop it (supply of drugs) off." LIGON said, "I'll for real man, we need that (supply of drugs), I'm about to see if that nigga (Chicago drug supplier) ready man (has supply of drugs to sell)." WILLIAMS said, "If I'm going to do something tonight I'm going to call you man so I link up with it (link up with Chicago drug supplier to get supply of drugs)." LIGON stated, "Ok, he will show you what's up."

15. On June 11, 2010, at approximately 3:17 p.m., JASON MORGAN called RAYSHAWN LIGON on the telephone. MORGAN stated, "42 . . . you said 42 (grams of heroin)?" LIGON replied, "Yeah." MORGAN stated, "I'm running, I'm running outta short (cut used to make drugs weigh more)." LIGON said, "Alright, then, you know, make it add up (add cut to make the heroin weigh 42 grams)."

16. On June 11, 2010, at approximately 6:34 p.m., RAYSHAWN LIGON called JULIUS CARSON, JR. on the telephone. LIGON stated, "Hey dad, he (LIGON's drug customer) about to come get you. . . . Go around the corner and get old buddy (drug associate), take him (drug customer) around the corner and have him put the 14 (give 14 grams of heroin to LIGON's drug customer) on there." CARSON stated, "Okay, alright I got you." LIGON said, "Then I'm going to have you go back to the hood, I'm going to have my little

nigga (drug customer) meet you, he going to give you like uh, I think, 13 cent (\$1,300), 13 hun, he going to give you 13 hun (\$1,300)." CARSON stated, "Ok, have him go down, come on Gooding (Street) . . ."

17. On June 11, 2010, at approximately 9:54 p.m., PERRY Avery, JR. called RAYSHAWN LIGON on the telephone. During the conversation, Avery stated, "I got different two cans of chew and shit, I got it dip and a bud, two cans of chew (supply of heroin)." LIGON asked, "You already put it together for them (packaged the heroin for their customer)?" Avery said, "Yeah, that is what I'm doing right now, this shit hurt my hands like a motherfucker too, Ray man, putting these balloons (packaging balloons of heroin)." LIGON asked, "Hey, how the fuck are you going to get all that shit (balloons of heroin) together in there (person's stomach)?" Avery said, "It is only going to be like 35 balloons." LIGON said, "He (body carrier) can't get them all in one shot (ingest 35 balloons of heroin to transport)." Avery said, "Yeah, they swallow like 30 balloons at once." LIGON said, "Damn!" Avery continued, "They lay little low, I'll let you see them."

18. On June 12, 2010, at approximately 7:29 p.m., RAYSHAWN LIGON called JASON MORGAN on the telephone. LIGON asked, "Yeah bro, what you want?" MORGAN replied, "Uh, two (an amount of heroin)." LIGON said, "Alright."

19. On June 13, 2010, at approximately 2:32 p.m., RUBY SEAGRAVES called RAYSHAWN LIGON on the telephone. SEAGRAVES said, "Look, look, we are leaving Wilmington (Ohio) like around 6:30 tonight, which is like past Columbus, so we should be like around 10 (o'clock in Cleveland) or so . . . Miranda (heroin customer) and I want to make sure that you are going to be up so we can get some of that good (high quality heroin)." LIGON replied, "Oh yeah, I'll definitely be up waiting on you." Later, SEAGRAVES asked, "How was that stuff (marijuana that SEAGRAVES previously traded for heroin)?" LIGON replied, "It was no good. I still got it man. Them niggas (marijuana customers) say they don't even get high man. I'm trying, I'm trying (to sell the marijuana). . . I let that shit dry out and everything." SEAGRAVES said, "Did you? Okay, well, I mean we can, I can see what, I think Mark (marijuana grower), Mark cut one (marijuana plant) over the weekend. He probably hand it in the basement. . . I mean, I can see how dry it is, even if it's not dry, you know if you want we can swap (trade marijuana for heroin). . . we (SEAGRAVES and Miranda) want to get uh, probably a hundred (an amount of heroin), like trade you (for marijuana), or like half cash or whatever, we'll figure out." LIGON replied, "Alright, sure."

20. On June 13, 2010, at approximately 3:03 p.m., RAYSHAWN LIGON called VAN HERRON on the telephone. LIGON asked, "What's

up boy?" HERRON replied, "What's up boy, what are you doing?" LIGON stated, "All man, working (selling heroin) man. I should be wrapping everything up by, uh tomorrow though (LIGON will have sold the heroin he received from HERRON by tomorrow)." HERRON said, "Alright." LIGON replied, "So, I'll be getting at you boy (to pay off his drug debt). Trying to finish this shit on up you know (sell the remaining heroin)."

21. On June 13, 2010, at approximately 5:10 p.m., RAYSHAWN LIGON called WILLIAM EFFORD on the telephone. LIGON stated, "How I'm looking?" EFFORD stated, "Like 'bout, I probably need about 11 (11 grams of heroin) or a bash (\$1,000 worth of heroin) something like that. . . So, tomorrow I should be coming to see you sometime (with money) tomorrow." LIGON said, "Man, I'm trying to grab this shit (drugs) from this nigga man, so you still need a band (\$1,000)?" EFFORD said, "Huh yeah, I got like about, about eight (\$800) or something though." LIGON said, "Wanna see if you can add another, see if you can add another two (\$200), see if you can make another two (\$200) man. I'm gonna call you, I'm gonna call you in a minute man . . . , cause I got to grab this shit (heroin) from this nigga. . ." EFFORD said, "But for real though man, on everything, my shit (money) be fucked up cause shit (heroin) really ain't that good (poor quality heroin) though Ray, for real." LIGON said, "I'm trying to grab some stupid shit (high quality heroin) man. . . I didn't

even touch that shit (LIGON did not cut the heroin), how I got that shit (quality of heroin) is how I gave it to you (EFFORD)."

22. On June 14, 2010, at approximately 1:59 p.m., RAYSHAWN LIGON called WILLIAM EFFORD on the telephone. EFFORD said, "Oh yeah, give me like two hours. I think I might be able to come in heavy (bring LIGON money). I got a couple people (heroin customers) right now want (heroin) though." LIGON said, "Alright."

23. On June 14, 2010, at approximately 3:28 p.m., RAYSHAWN LIGON called DIVAUGHN LIGON on the telephone. RAYSHAWN said, "Hey, Josh (heroin customer) 'bout to be on 95th (Street) man." DIVAUGHN said, "Alright." RAYSHAWN replied, "Half gram (of heroin)." DIVAUGHN said, "Alright."

24. On June 14, 2010, at approximately 5:45 p.m., RAYSHAWN LIGON called SHERTARRA CATRON on the telephone. LIGON asked, "What did you do with my blender (heroin grinder)?" CATRON said, "Oh, shit, ok look, damn, give me like three seconds, I'm on my way in now." Approximately, eight minutes later, CATRON called LIGON on the telephone. CATRON said, "When you done with all that stuff that you leaving there (heroin and heroin grinder), stick it, um, um, um, um, under my bed and just bring me my keys back. (LIGON is utilizing CATRON's residence at on East 99th Street, as his drug stash house)." LIGON stated, "Alright."

25. On June 14, 2010, at approximately 6:10 p.m., RAYSHAWN LIGON called LEONARD COLE on the telephone. LIGON stated, "Pull on 99 (East 99th Street) real quick. I need a like, just a little two and a half (a quantity of heroin) real quick." COLE replied, "Alright."

26. On June 14, 2010, at approximately 11:03 p.m., JAMES HENRY called RAYSHAWN LIGON on the telephone. HENRY asked, "What's up with the deuce Bigelow (two ounces of heroin), what we need?" LIGON asked, "A deuce bigelow, you talking about two (ounces of heroin) the whole way?" HENRY replied, "Yeah." LIGON said, "Just five (\$5,000 for two ounces of heroin)." HENRY asked, "What about on the un-side (quality), you feel me?" LIGON said, "It's going to be soft and it's going to be solid." HENRY said, "No, but I'm saying, it's my turn now, he (the customer) owe me, so I can throw a little something (cut to mix with the heroin) in there." LIGON asked, "So you want me to put something together where, where as . . ." HENRY said, "You know, you know how you did the last shit (the same as the previous heroin purchase)." LIGON replied, "Right."

27. On June 15, 2010, at approximately 1:50 p.m., RAYSHAWN LIGON called JASON MORGAN on the telephone. LIGON asked, "You open up? You tell them that I said make my people some of that shit?" MORGAN asked, "What?" LIGON replied, "What you, what you

want on that shit? Give me two grams (of heroin)." MORGAN said, "Alright."

28. On June 19, 2010, at approximately 2:26 p.m., RUBY SEAGRAVES called RAYSHAWN LIGON on the telephone. During the conversation, SEAGRAVES said, "Okay, cause I got to make a stop at that bar downtown real quick and pick up some money (from a customer) and then. . ." LIGON interrupted, "Alright, what (how much heroin) y'all want?" SEAGRAVES asked someone in the background, "Do you want a gram (of heroin)? Huh?" and then said to LIGON, "A gram." LIGON said, "Alright, call me."

29. On June 20, 2010, at approximately 1:46 p.m., an Unknown Female (UF) called RAYSHAWN LIGON on the telephone. The UF asked LIGON for money. LIGON replied, "I ain't bull shitting man, these nigga up in Chicago (Chicago-based drug suppliers) man fucked me out of fifty five grand (\$55,000) man." The UF asked, "How much?" LIGON said, "Fifty five grand." The UF asked, "How?!" LIGON said, "Man, tired of that shit, that shit be wrong. I gave them niggas my mother fucking money man, I should of never did that shit, I can't even get in contact with these chumps (LIGON sent \$55,000 to Chicago-based drug suppliers and has not heard back from them). I ain't even trippin' though man, I'm gonna get that shit right back (make the loss up quick)." Later in the conversation, LIGON stated, "I got some good shit going on, Thursday with these other people out from Cali

(California-based drug supplier), should about back together man, I go to make that money back up though."

30. On June 21, 2010, at approximately 12:46 a.m., RAYSHAWN LIGON called MICHAEL FASON on the telephone. FASON said, "I'm about to slide down there in a minute. Dude (drug customer) only grabbed one (ounce of heroin) off me last night, but he said he wanted the other one (ounce of heroin) too. He tried to get that bitch (heroin) on credit, I wouldn't give it to him, so he told me to hold fast (hold onto the heroin) cuz he was gonna get it so I'll probably call him in a few minutes and ask him if he want the other one (ounce of heroin) cuz he only got one of them from me yesterday and shit." LIGON said, "Ok."

31. On June 21, 2010, at approximately 4:31 p.m., WILLIAM EFFORD called RAYSHAWN LIGON on the telephone. EFFORD stated, ". . . I really only got like half of what, of that six (a quantity of heroin left) though, but like for real though, you know that shit really, that shit was really bad (poor quality heroin) though man, I did all that shit though (sold the heroin), you feel me?" LIGON said, "I know you did. . . I'm 'bout to call you, my people (LARRY NEAL and BRAULIO DIAZ) just came home. . . I'm 'bout to call you as soon as I get back down the neighborhood." EFFORD said, "Alright, alright, by then I probably made some more money (for LIGON) though for real." LIGON said, "Alright."

32. On June 21, 2010, at approximately 5:33 p.m., RAYSHAWN LIGON called LEONARD COLE on the telephone. LIGON stated, "You know I need this, hit my move. Where is you Scoot?" COLE replied, "Right here, coming off about 55th (East 55th Street)." LIGON said, "You meet me down there on 88th (East 88th Street) somewhere right now." COLE said, "What you talking about?" LIGON replied, "Uh, nah, just some, I'm uh, my man (drug customer), he wanted a little basketball (3.5 grams of heroin), so I'm put a little play down, you know." COLE replied, "Aight." LIGON stated, "Like a deuce, probably like a two play (two 3.5 grams packets of heroin)." COLE stated, "Alright."

33. On June 22, 2010, at approximately 3:51 p.m., RAYSHAWN LIGON called MICHAEL FASON on the telephone. FASON said, ". . . I'm going to need you on your end (heroin). How you do what you do (sell and cut heroin). I'm going to need you. I just got a boat load (supply of heroin) light weight small boat load. We gonna work everything out. I'm going to need you to show me (how to cut heroin), you know what I'm saying? Cuz the nigga just came to me, like can you do this for me? I told him that ain't even my lane (heroin), but I know of a couple of people (LIGON) . . . it ain't nothing super major, but its major for a nigga like me that don't do it. I asked him if I can do something to it (cut the heroin) and he said yea. . . I was gonna call you anyway, I wanted it to be in my possession first. I got a spot

we could go to and all that, or if you have a spot, that's cool too cuz I know you probably gotta have some, you know some utensils (tools to cut and mix heroin) or what not." LIGON replied, "Alright, just pull up to the car wash."

34. On June 22, 2010, at approximately 7:15 p.m., Kevin (an individual known to the Grand Jury) called RAYSHAWN LIGON on the telephone. Kevin stated, "Nigga Wayne, that nigga Wayne (LIGON's heroin customer) right here on Columbia at the bottom of Columbia." LIGON said, "I'm about to call LOU (LIGON's brother DIVAUGHN LIGON) right now." Kevin said, "LOU coming from the West-side." LIGON said, "He on the West." Kevin said, "That nigga right here, I told you all this where the nigga be at man. He standing on the porch the nigga's car right there, he always be right there man, now the nigga right there man." LIGON replied, "I got to get the hammer (weapon) man. You got the hammers (weapons)?" Kevin said, "No, you all got my shit nigga (all of Kevin's weapons)." LIGON said, "You got the hammers (weapons) man?" Kevin said, "You all got to call Bloop (a drug customer) man call (UI)." LIGON said, "I'm about to call him."

35. On June 22, 2010, at approximately 8:59 p.m., JAMES HENRY called RAYSHAWN LIGON on the telephone. HENRY said, "I need like 3.5 (grams of heroin) quick." LIGON replied, "Alright, I'm about to put it down for you."

36. On June 22, 2010, at approximately 11:04 p.m., RAYSHAWN LIGON called DIVAUGHN LIGON on the telephone. RAYSHAWN stated, "He (drug customer) said you could come back and get that paper (money)." DIVAUGHN asked, "Already?" RAYSHAWN said, "Yeah he (drug customer) going to give you 250 (\$250) though." DIVAUGHN said, "Alright."

37. On June 22, 2010, at approximately 11:02 p.m., JAMES HENRY called RAYSHAWN LIGON on the telephone. During the conversation, LIGON asked, "But, uh, everything cool?" HENRY said, "Yeah, that is what I'm saying. Two fifths or what?" LIGON replied, "Yeah, yeah, go ahead, give em (the heroin customers) two-five (sell 2 ounces of heroin for \$5,000)." HENRY asked, "Five?" LIGON said, "What did you guy wanted three (3 ounces of heroin)?" HENRY said, "Nah, I tried to hit him with the tres ball (3 ounces of heroin)." LIGON stated, "Oh, and he didn't wanna go for, alright." HENRY said, "Just cause how it (heroin) looked (like poor quality), you feel me." LIGON said, "Right."

38. On June 23, 2010, at approximately 11:08 a.m., Kevin (an individual known to the Grand Jury) called RAYSHAWN LIGON on the telephone. Kevin said, "What happened yesterday, why didn't they wait until that nigga (Duane Gibson, a target of a drive by shooting) got in his car?" LIGON said, "I don't know, they got (shot) all three of them anyway, you know that. They got all

three of them, they say that nigga came up with big shit (large caliber weapon) though. . ." Kevin said, "They say they whacked (shot) them though?" LIGON said, "My little cousin Bloop (drug customer) say all three of got hit, my little cousin Bloop was on his way down there, but they already did it (conducted drive by shooting), Bloop say all three of them got hit. He grazed my little nigga right on the wrist. That nigga probably had that 40 (40 caliber weapon). . . They say let me know where the BM (Wayne's baby's mama) stay, just let me know that and don't worry about nothing else, they going to lay on that nigga (find Wayne and shoot him)."

39. On June 23, 2010, at approximately 9:21 p.m., RAYSHAWN LIGON called an Unknown Male (UM), aka Pill Mill, on the telephone. LIGON stated, "I heard old boy (Wayne, heroin customer) and two of his dudes got hit up (shot)." The UM asked, "Who?" LIGON said, "Wayne." The UM asked, "Who is that?" LIGON stated, "Come on man, the nigga that hit me for the ten racks (stole \$10,000 worth of heroin from LIGON)." The UM stated, "I'm saying, two of his dudes got hit (shot) up?" LIGON said, "Him and two of his dudes."

40. On June 24, 2010, at approximately 4:17 p.m., JAMES HENRY called RAYSHAWN LIGON on the telephone. HENRY said, "That nigga (heroin drug customer) just called me man. . . I told him he owed us \$500 (for previously supplied heroin), he like shit, I

got that (money), he was like man, but I want some flame (high quality heroin) or I don't want that shit. . . He's (heroin customer) like the last shit (heroin) was alright but, I had to work with it (add cut to make a profit and it was hard to sell). . . We need to get this dude some flame, we have to tax him, fuck it (charge customer more for high quality heroin)." LIGON said, "Alright, I got the flame shit (high quality heroin)." HENRY said, "Alright, I'ma about to, uh, I'm about to wait for him to call me, he talking about, he about to be here. . . When I call you it's going down." LIGON said, "Alright."

41. On June 26, 2010, at approximately 4:25 p.m., MICHAEL FASON called RAYSHAWN LIGON on the telephone. FASON said, "I said I got to move right (I have a heroin customer), I gotta, I gotta small for two grizzlies (two grams of heroin) right. You listen to me?" LIGON replied, "Yeah, I heard that, yeah." FASON said, "Okay, but listen. It's going to a nigga (customer) though, it ain't going to the people (users), it's going to nigga, and I told him two dollars (\$200)." LIGON replied, "Right." FASON said, "But my thing was, I was trying, I was trying to see something of the move, like something proper off the move, really trying to see a dollar (\$100) or like 75 (FASON wants to make a \$75-\$100 profit from the sale), I was trying to get it (two grams of heroin) for like 125 (dollars). . ." LIGON said, "Right."

42. On June 26, 2010, at approximately 4:39 p.m., MICHAEL FASON called RAYSHAWN LIGON on the telephone. FASON asked, "Yeah, where baby bro (DIVAUGHN LIGON) at?" LIGON replied, "He right there on 105 (Street), but call him cause he is about to go and grab it (heroin) right quick from the little spot (stash house)." FASON asked, "You tell him, you tell him two jizzies (two grams of heroin)?" LIGON replied, "Yeah." FASON asked, "Alright, what's the number?" LIGON said, "372-9659 (DIVAUGHN LIGON's telephone number)." FASON said, "Alright."

43. On June 26, 2010, at approximately 8:08 p.m., DIVAUGHN LIGON called RAYSHAWN LIGON on the telephone. DIVAUGHN said, "I got the money from PT (MICHAEL FASON)." RAYSHAWN said, "Oh, you got it from him? I will be there in a minute."

44. On June 28, 2010, at approximately 1:26 p.m., Rasheed LNU called RAYSHAWN LIGON on the telephone. LIGON said, "Call my little brother (DIVAUGHN LIGON) he going to come through there (to sell Rasheed drugs), call 372-9659." Rasheed asked, "Do I know him?" LIGON said, "Yeah, LOU (DIVAUGHN LIGON)." Rasheed said, "Oh, LOU. Oh, ok."

45. On June 28, 2010, at approximately 4:40 p.m., JAMES HENRY called RAYSHAWN LIGON on the telephone. HENRY said, "Hey, keep the bitch two, say he gonna do the same thing he did last time (HENRY's drug customer wants the same amount of heroin he purchased last time)." LIGON said, "Alright, I'm about to put

you together now (package the heroin)." HENRY asked, "Alright bro. Hey, what's about the other nigga (other heroin customer) man?" LIGON said, "We going to do that too (sell heroin to other customer)." HENRY said, "This nigga keep callin' me, but I ain't even fuckin' with him no more. He blew that." LIGON asked, "He said he got that 500 though too?" HENRY said, "He trying to tell me 4,200 (customer ordered \$4,200 worth of heroin). I'm like, dude, it was 4,000 (\$4,000 worth of heroin) dude." Later, LIGON said, "I going to put it together (package heroin) before I leave from pickin' my car up." HENRY said, "Alright."

46. On June 28, 2010, at approximately 8:41 p.m., RAYSHAWN LIGON called LEONARD COLE on the telephone. LIGON stated, "Oh, okay, I'm about to come down . . . I just need a couple (ounces of heroin) right quick." COLE replied, "I ain't got shit . . . I'm waiting until tomorrow." LIGON said, "Aight, me too, my people be on the freeway tomorrow, damn!"

47. On June 28, 2010, at approximately 9:25 p.m., DIVAUGHN LIGON called RAYSHAWN LIGON on the telephone. During the conversation, RAYSHAWN stated, ". . . You know I'm gonna hit you heavy tomorrow (have large quantities of heroin to sell), they coming in tomorrow (LIGON's heroin suppliers are arriving with shipment of heroin) . . . I'm ah put you together boy (provide DIVAUGHN with heroin to sell)."

48. On June 29, 2010, LARRY NEAL, BRAULIO DIAZ and others traveled to Cleveland, Ohio, from Chicago, Illinois, and supplied RAYSHAWN LIGON with approximately 300 grams of heroin.

49. On June 29, 2010, at approximately 4:26 p.m., RUBY SEAGRAVES called RAYSHAWN LIGON on the telephone. SEAGRAVES said, "Listen, I want . . . I got some different shit (marijuana), I wanna know if you can swap (trade marijuana for heroin)?" LIGON replied, "Uh, yes. But let me check it (the marijuana) out."

50. On June 29, 2010, at approximately 2:45 p.m., RAYSHAWN LIGON called Kevin (an individual known to the Grand Jury) on the telephone. During the conversation, LIGON said, "I got the one Mexican (BRAULIO DIAZ) up here now though, at my other apartment. They already here Kevin."

51. On June 29, 2010, at approximately 5:34 p.m., LEONARD COLE called RAYSHAWN LIGON on the telephone. LIGON asked, "You had that move (drug sale) already?" COLE replied, "Naw." LIGON said, "Alright, I got ya rocka socka flame (high quality heroin) for you." COLE replied, "Alright."

52. On June 29, 2010, at approximately 8:43 p.m., WILLIAM EFFORD called RAYSHAWN LIGON on the telephone. EFFORD said, "Please tell me you can sell me something better than that, because I just dumped (sold poor quality heroin)." LIGON replied, "This shit, I got two reals (two different quantities of

heroin), a 9 and a 10, it's all stupid (the two quantities of heroin LIGON bought were high quality)." EFFORD said, "Give me the 10, go ahead and charge me whatever full price though, I rather pay that, I'm paying, look out for me." LIGON said, "Alright."

53. On June 30, 2010, at approximately 12:20 a.m., RAYSHAWN LIGON called KYRON MARLIN on the telephone. MARLIN said, "I'm going to get with, get with you too (to buy heroin), get into the swing." LIGON asked, "The material (heroin) today they (MARLIN's suppliers) been giving you been cool (good quality heroin)?" MARLIN replied, "It's been fair." LIGON said, "I got some stupid shit (high quality heroin) going on."

54. On June 30, 2010, at approximately 10:17 a.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. NEAL stated, "Yeah, I was just, what I want, see if you had the three (quantity of money), that way I can go get the dollar (quantity of heroin) from dude (NEAL's heroin supplier), know what I'm saying?" LIGON said, "I'm waiting on dude (LIGON's drug customer), he say dude suppose to be pulling up at twelve to his house and shit and I'm about to shoot out there and quick (pick up money)." NEAL said, "Like I said, we want to give these niggas (Chicago-based heroin suppliers) money so they do not get impatient and think we can't make it happen (pay them for shipments of heroin), you know what I'm saying?" LIGON said, "Hell ya, I know exactly how this shit

go." NEAL said, "You know these mother fuckers (Chicago-based heroin suppliers) don't see no money, nigga gettin' to talking, man I thought you said it was going down. I ain't trying to sweat you (hurry you) but shit I'm trying to (set up more shipments of heroin), you know what I'm saying?" LIGON replied, "Everything is a go man, you know we just now getting back. I'm catching up (collecting money), that shit going to be boom (sell a lot of heroin). I hollered at my one dude (LIGON's heroin customer) last night, I usually hit him with buck (100 grams of heroin) and within three days he be done with it (sold all the heroin). I usually hit him with the whole 100 (grams), he still do like \$3,000 a day (sells \$3,000 worth of heroin per day). I was telling him, I have to take care of these people (Chicago-based heroin suppliers) so I can get back in motion, so they can release this other thing (send more shipments of heroin). He was like he could come up with like a quarter (an amount of money), I'm going to go ahead and shoot that to you and let you give me the quarter (quarter kilogram of heroin) and you can take that quarter over there and boom release that (send more heroin)."
NEAL said, "Right, right, right."

55. On July 1, 2010, at approximately 8:23 p.m., RAYSHAWN LIGON called STETSON WHITE on the telephone. WHITE said, "I talk to my people (heroin customers) last night, she said she was gonna do something today matter of fact." LIGON asked, "Gonna

try something today?" WHITE said, "Yeah, she say that when you get ready and shit to call her . . . I had really, I just called you sick (from heroin withdrawal) and shit cuz I ain't even have no little shot, I needed a little, you know a granny (gram of heroin)." LIGON replied, "Oh yeah, I'm on my way down. I got some fire shit (high quality heroin) too."

56. On July 2, 2010, at approximately 1:40 p.m., RAYSHAWN LIGON called RUBY SEAGRAVES on the telephone. During the conversation, SEAGRAVES said, ". . . But look, I got to talk to you about the, the stuff (heroin) that you had gave us . . . it's like it makes her (heroin customer) not sick, you know, like she's, but she's not sick, but that's it (the heroin quality was poor). You know what I mean? Like the stuff (heroin) we had got from you the time before that, it was the bomb (high quality)." LIGON replied, "Right, I still got that. Listen though, but that stuff you gave me though (marijuana traded for heroin), that shit (marijuana) ain't all that man. Like it ain't that same like my father (JULIUS CARSON, JR.) smoked." SEAGRAVES replied, "Yeah, that's the same shit, it came from the same jar."

57. On July 2, 2010, at approximately 6:51 p.m., STETSON WHITE called RAYSHAWN LIGON on the telephone. WHITE asked, "Shit, what time you 'bout to go out there?" LIGON replied, "Oh, in a minute, I'm tryin' to hit these little drops (complete these

heroin sales) real quick and I'll be ready (to sell to you)."
WHITE replied, "Alright, just call me."

58. On July 2, 2010, at approximately 8:23 p.m., RAYSHAWN LIGON called EARL KING on the telephone. LIGON stated, "What up? Uh, you said, uh, now what was that Papa?" KING replied, "Uh, what you gave me (heroin) yesterday." LIGON asked, "Oh, it's the whole thing left?" KING replied, "Un hum." LIGON said, "Alright, oh shit, alright, cool. Yeah, grab it for me, I'm gonna uh grab that and dump it to this one nigger (customer) quick. I'll come through and get it in a little bit." KING asked, "You 'bout to uh, get it (heroin) now?" LIGON replied, "Yeah."

59. On July 2, 2010, at approximately 9:23 p.m., JAMES HENRY called RAYSHAWN LIGON on the telephone. HENRY said, "You got uh, you put like three of them bitches down (prepare 3 ounces of heroin)? . . . Can you put three of them bitches down?" LIGON asked, "Whole one (ounces)?" HENRY said, "Yeah." LIGON said, "Yeah."

60. On July 2, 2010, at approximately 11:55 p.m., JAMES HENRY called RAYSHAWN LIGON on the telephone. HENRY said, "I said QA got 35 and other nigga got \$5,200 (HENRY has two heroin customers that want to purchase \$3,500 and \$5,200 worth of heroin). . . That's what I'm sayin', get your numbers together, or I ain't coming." LIGON stated, "Alright, I gotcha."

61. On July 3, 2010, at approximately 2:46 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. During the conversation, LIGON stated, "I am going to be like, I'm going to grab it (money) you know. It should be cool. We should be good about 3 o'clock you know that's nigga time, that mean 4 o'clock for real." NEAL said, "However you get it (money), we have to get it as it come." (LIGON's Chicago-based supplier is waiting on LIGON to collect drug proceeds).

62. On July 3, 2010, at approximately 4:22 p.m., JAMES HENRY called RAYSHAWN LIGON on the telephone. HENRY asked, "Hey, uh, uh, deuce five for one (\$2,500 for one ounce of heroin)?" LIGON replied, "Yeah, that's cool." HENRY said, "Alright, and I, uh, got uh, my little brother come up with the other nigga (heroin customer) for another two (ounces of heroin)." LIGON replied, "Alright."

63. On July 3, 2010, at approximately 8:29 p.m., RAYSHAWN LIGON called WILLIAM EFFORD on the telephone. LIGON stated, "Shit, I need something boy (money)." EFFORD replied, "Shit, I only got like 400 though, . . . that's all I got period." LIGON said, "I need something dog, I gotta take care of these people (LARRY NEAL and BRAULIO DIAZ)." EFFORD said, "I mean, I ain't even got rid of shit (heroin) for real, except for like two g's (2 grams of heroin). . . I was planning on probably giving you a whole five (\$500) of it on Monday though." LIGON said, "I got

these people (NEAL and DIAZ) trying to make it home (back to Chicago) for tomorrow. I'm just gonna grab a deuce (\$200) from you then." EFFORD said, "Alright."

64. On July 4, 2010, at approximately 8:10 p.m., JAMES HENRY called RAYSHAWN LIGON on the telephone. HENRY said, "Like, I prolly, I prolly lost about four little shit (HENRY previously stated he lost four grams of heroin during a foot chase with the police). . . it was so much of that shit at the bottom, I couldn't even, you feel me, I didn't want to give a nigga all the pieces like that (poor quality heroin), you feel me?" LIGON said, "But two of those shit (ounces of heroin), that's your biggest play. . ." HENRY said, "I know, but I ain't, he wouldn't want take all the bottom (poor quality heroin) you feel me? I couldn't do him, if I would have gave him all the shit that was on top bro, it was really going to be nasty, you feel me?" LIGON said, "I mean that shit ain't about nothing though." HENRY asked, "Oh, you can?" LIGON said, "Yeah. . . You should have made that play (sell the customer the poor quality heroin) and then I would have made it over for dude." HENRY said, "Oh, ok, alright, that's cool, I'm 'bout to call them back, and just, uh, I'm just tell him I just give him all the pieces (of heroin). . . Cause all the pieces was mother fucking exactly two (ounces) bro. . . the bottom was like, like 2.8, like 2.78 and some shit." LIGON said, "Alright, go ahead and do that then."

65. On July 4, 2010, at approximately 10:50 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. NEAL stated, "It must not be working out for ya (collecting drug proceeds)?" LIGON said, "I don't know man, he (LIGON's drug customer HENRY) keeps saying dude's on his way to his house (with money) so I'm just waiting on that (money). I will bring it (money) to him (Mexican heroin suppliers) in a minute hopefully." NEAL said, "Yeah, I know ain't nothing we can do shit but wait (for the money)." LIGON stated, "You know what I was thinking, if it gonna go like this we just need to pump it up (add pure heroin) with what they got (poor quality heroin) man they (Mexican suppliers) need to just let us mix that and just roll it all you know what I'm saying?" NEAL said, "Right, I don't think they gonna want to do that shit you know what I'm saying. You know how the shit go man." LIGON said, "We'll see see how it go man. I'm waiting on him."

66. On July 6, 2010, at approximately 2:46 p.m., LEONARD YOUNG called RAYSHAWN LIGON on the telephone. YOUNG said, "I know what that is. It's a fire and shit (high quality heroin). I know what it was when I seen the shit (heroin)." LIGON asked, "Alright, was like a what?" YOUNG said, "About a 9 (quality 9 out of 10)." LIGON said, "Alright."

67. On July 7, 2010, at approximately 10:19 a.m., MICHAEL FASON called RAYSHAWN LIGON on the telephone. FASON said, "Oh,

I'm 'bout to shoot down on the side, I was tryin' to bump into you to get the same one-two play (two grams of heroin) for a dollar and a quarter (\$125)." LIGON replied, "Yeah, I'm all the way out right now. I'm gonna be comin' down in a minute though."

68. On July 7, 2010, at approximately 1:23 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. During the conversation, LIGON stated, "I got another move (customer) for two (ounces of heroin) right. But you ain't got no material (heroin). I'm charging the nigga 54 (\$5,400) for two (ounces of heroin). So if you could get them (Mexican suppliers) to give you a 28 (grams of heroin) and we can bring back the 5000 (\$5,000), we can get two for yesterday and three (\$3,000) on that 45 (\$4,500) that we owe them, we owe them 45 (\$4,500) right?" NEAL said, "No, we owe them (Mexican suppliers) five (\$5,000)." LIGON said, "We can bring them three on the five we owe them, we can give them the whole five (\$5,000). . ." NEAL said, "I got 50 (grams of heroin) from them." LIGON asked, "You got 50 (grams of heroin) from the man (Mexican supplier)?" NEAL said, "I got 50 that is not touched (50 grams of pure heroin) from them last night, remember when you told me we might have to mix a little some of that (mix pure heroin with lower quality heroin), so I told them give me 50 just in case we have to mix something." LIGON said, "That is perfect. This is all you got to do. Put a 28 (grams of pure heroin) on the 28 (grams of lower quality heroin) and lock it up

(mix it) real quick and come get me." NEAL said, "I can't lock that up by myself, I am going to try though." LIGON said, "You got amigo (the Mexican) over there going to rrrrrrrr (mix it)." NEAL said, "I got nobody over here, I dropped them (Mexican suppliers) off at the room..." LIGON said, "Do the best you can."

69. On July 7, 2010, at approximately 5:18 p.m., RAYSHAWN LIGON arrived at a prearranged meeting location in the greater Cleveland, Ohio area, driving his black Audi A8. During the meeting, Source 3 paid LIGON \$5,200 for approximately 57.8 grams of heroin.

70. On July 7, 2010, at approximately 9:00 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. NEAL stated, "Just giving you a call. I got that man, we gotta try to get this shit gone quick as possible man (sell the remaining heroin supply quick), because they (Mexican suppliers) got to get up out of here (the Mexicans have to leave Cleveland with drug proceeds)." LIGON replied, "Alright, you know, I'm doing my job (selling heroin), we moving on, we are on the line. I am going to try and dump this off real quick (sell heroin) and I'm gonna move so we can finish that (collecting money for the Mexican suppliers)." NEAL said, "Alright."

71. On July 7, 2010, at approximately 9:41 p.m., DARNELL HAYNES called RAYSHAWN LIGON on the telephone. HAYNES asked,

"What you gonna, uh, you gonna whack (charge) him for the 17 (grams of heroin)? . . . for the 17, what you want?" LIGON replied, "Um, shit, I give it to you, um, I can do something like, uh. . . shit man, I can doing something like 1675 (dollars) or something." HAYNES asked, "What, uh, that ain't, you think, um. . . 11 (cutting the heroin with 11 grams of cut to make 28 grams/one ounce) on that gonna be terrible ain't it?" LIGON replied, "11, naw, this shit (heroin) stupid (high quality)."

72. On July 8, 2010, at approximately 12:07 a.m., RAYSHAWN LIGON called STETSON WHITE on the telephone. WHITE said, "FU-FU (DARNELL HAYNES) told me to call you because you needed the whack (cut for heroin) or something, talking about you about to come get it." LIGON replied, "Man, that nigga crazy man. Where it (the cut) at?" WHITE replied, "It's at my little thing's (girlfriend's) house."

73. On July 8, 2010, at approximately 12:11 a.m., DARNELL HAYNES called RAYSHAWN LIGON on the telephone. During the conversation, HAYNES asked, "See BOOTY (JASON MORGAN), don't want to chop and squoosh (cut heroin), what you want for the twamp (20 grams of heroin)?" LIGON replied, "Um. . . yeah, like 1875 (dollars)." HAYNES said, "You say 187 . . . so you ain't gonna 1850 (dollars) it?" LIGON said, "I'll do 1850."

74. On July 8, 2010, at approximately 12:17 a.m., RAYSHAWN LIGON called JASON MORGAN on the telephone. LIGON asked, "You

said dude (heroin customer) wanted the 20 (grams of heroin)?" MORGAN replied, "Yeah, man." LIGON asked, "Alright, when they want it? . . You ready now?" MORGAN said, "Yeah, I'm trying to find some whack (cut), so I can get me some shit man." LIGON replied, "Um, that nigga STET (STETSON WHITE) said he had some whack (cut) right here on 105 (Street). But shit, um, what you trying to make on that move (How much money are you trying to make on the heroin sale)? What you trying to do?" MORGAN replied, "Man, I'm trying to get me a eight ball MJG (Michael Jordan's jersey number meaning 23 grams of heroin) . . ." LIGON asked, "Oh, he (drug customer) wanted to do deuce eight (28 grams of heroin)?" MORGAN replied, "Yeah."

75. On July 8, 2010, at approximately 4:03 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. LIGON said, "I'm grabbing this bread (money) from this dude and I'm going to link right up with." NEAL said, "Me and dude sitting in the house, the other guy left because he had to go. The older one stayed with me. The young one, he took that money to them (Mexican suppliers) because they keep stressing him out man, they keep calling him like he ran off, he like fuck I'm not going no where, shit not moving (heroin not selling) the way it's suppose to." LIGON said, "We going to show them what we made of."

76. On July 10, 2010, at approximately 3:05 p.m., RAYSHAWN LIGON called an unknown male (UM), aka T, on the telephone.

LIGON asked, "What up T, what you want me to put together?" The UM said, "I need two and a half gangsters (2.5 grams of heroin). Separate them for me." LIGON said, "Alright."

77. On July 10, 2010, at approximately 10:42 p.m., RAYSHAWN LIGON called EARL KING on the telephone. KING stated, "They (KING's heroin customers) threw the towel in on my cuz. . . Man, I tried, damn man, they didn't wanna play (KING's heroin customers complained about the quality of the heroin and didn't want to purchase it)." LIGON said, "That shit (heroin) bad (quality), man." KING replied, "You know how that be when people got a choice man." Later, LIGON asked, "How far you got along with it (how much heroin did you sell)?" KING said, "I ain't even get that far, probably like seven grams. . . Yeah, I ain't even get that far cause, you know my people I got like 10, 15, people (heroin customers), you know, they run back and forth all day (sell drugs). . . But, you know, they ain't wanna fuck with it. . . They really ain't wanna play with it (purchase heroin). ." LIGON said, "My other people (LIGON's alternate heroin supplier) called me today, they sendin' me shit (poor quality heroin) like that for a month for a time damn near so." KING asked, "How far you get with that little shit (poor quality heroin) I gave you back?" LIGON said, "The main dude (heroin supplier), they get caught up in that shit (police seized ten kilograms of heroin), he say everything will be straight Tuesday

(a shipment of heroin will arrive Tuesday)." KING asked, "He said everything going to be good Tuesday?" LIGON said, "Yeah." KING asked, "Shit, what you want me to do? . . . I was thinkin', like shit, we just mix it (poor quality heroin) with the newer shit (high quality heroin)." LIGON said, "That would be cool but them mother fuckin' amigos (Mexican heroin suppliers), them mother fuckers be wantin' to see the numbers (money) come in for what they dished out (sold)." KING said, "I already know that for sure, if I could have we wouldn't be talkin'. . . I didn't want to burn any of my big people (good heroin customers) for my niggas, everybody come through and the material . . . burn them. . . I wanted to, but I couldn't. . . But, they didn't want to fuck with it. Even for the 100 (\$100 per gram), I went down to 90 (\$90 per gram)." LIGON said, "I can't believe it. I'm 'bout to get this shit right."

78. On July 10, 2010, at approximately 11:28 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. LIGON stated, "Man, I ain't gonna lie, you know what we did on it (mix heroin) and they still like no, no, no (heroin customers are complaining about the quality). My nigga (EARL KING) I thought see this is what I done for him yesterday, I hit my one man off that do the five o's (five ounces of heroin), so I hit him off boom, so I say ok boom, he get up early morning do his thing all day (sell heroin) he will have that for us (money) and then whatever I do

today, boom, boom, I will be able to get them (Mexican suppliers) out of here. Man, that nigga (EARL KING) just reported to me, he like cuz, I couldn't do nothing with it, he say man, I sold like a seven (grams of heroin) out of it, he like man the rest I got, I got the bread (money) for you, he like they waved the white flag on him they say naw (KING's customers did not like the heroin), man we can't work with that, I'm like damn." Later in the conversation, LIGON said, "Remember we said we were gonna sell it like the way it was and then remember I was like half should be good cause if they saying 7 to 9, people saying 7, some saying 9, (heroin quality out of 10) remember, I'm like half should be good, that way we can make you know, sometimes you get that type of shit where it just don't take to nothing, it be good the way it is, leave it alone (don't mix the heroin with cut), don't touch, you know what I'm saying?" NEAL said, "Basically, I'm trying to get my man out of here (Mexican supplier). If you can get the 5 (\$5,000) and the 2 (\$2,000), I mean that he can sweat it out for the rest of it, he can shoot out with the little 7 (\$7,000) and then I stay around with you until we finish off." LIGON said, "Alright, well that's cool, then that sounds good."

79. On July 11, 2010, at approximately 5:07 p.m., DARNELL HAYNES called RAYSHAWN LIGON on the telephone. During the conversation, HAYNES said, "I told BOOTY (JASON MORGAN) to call

you, he had a 40 lick (\$40 heroin sale). " LIGON replied, "I talked to him about that."

80. On July 11, 2010, at approximately 6:57 p.m., RUBY SEAGRAVES called RAYSHAWN LIGON on the telephone. During the conversation, SEAGRAVES asked, "Hey do you got something (heroin) different (better quality) or does your brother (DIVAUGHN LIGON) got something different?" LIGON replied, "Yeah, I got, I got some, got some top shit (high quality heroin) for ya." SEAGRAVES said to Miranda (heroin customer) in the background, "He has some top shit." SEAGRAVES then asked LIGON, "Hey, are you going to be around a couple of hours after the movie is over?" LIGON replied, "Yeah, give me a call."

81. On July 11, 2010, at approximately 8:59 p.m., LEONARD YOUNG called RAYSHAWN LIGON on the telephone. YOUNG stated, "Hey, look, check this out, I only did like two (grams of heroin) of them right, I still got some left and shit. That shit hold for awhile (heroin high lasts for a long time). That's shit is real good, it's probably a 9 or a 10 (heroin quality out of 10). LIGON replied, "Wow, for real?" YOUNG said, "Yeah 'cuz I still got like four (grams) of them left. The shit hold. . . You banging that . . ." LIGON said, "Alright."

82. On July 12, 2010, at approximately 1:01 p.m., RAYSHAWN LIGON called EARL KING on the telephone. LIGON stated, "Alright, I'm gonna come grab that shit (unsold heroin), uh, you ain't got

it down there do you?" KING said, "Uh, I got to go round it up, I got some of it (heroin) like down the way and I got some of it at my house." LIGON said, "Alright, yeah, because I'm gonna, uh, get my people (Chicago heroin suppliers) that paper (money) and give that shit (poor quality heroin) back to them . . ." KING said, "Yeah, I'll get it all together for you cuz." LIGON said, "Alright, I'm waitin' on you."

83. On July 12, 2010, at approximately 3:49 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. NEAL stated, "He's (Mexican heroin supplier) trying to see if you had a couple of dollars, he trying to send somebody 500 or 1,000 he said, he need to send his guy." LIGON said, "Wait for this dude (LIGON's heroin customer) come for this 2,500 right quick and I'll give that to you."

84. On July 12, 2010, at approximately 10:19 p.m., RAYSHAWN LIGON called SHERTARRA CATRON on the telephone. LIGON asked, "Where you at TT?" CATRON stated, "At home." LIGON said, "Put a 45 (grams of heroin) on the thing (scale) and put it in a bag." CATRON said, "I can't keep touching that (heroin), I have a drug test in the morning." LIGON said, "Man, I told you that shit don't go in your system like that man, all you gotta do is wash your hands with cold water."

85. On July 13, 2010, at approximately 1:57 p.m., RAYSHAWN LIGON called DIVAUGHN LIGON on the telephone. RAYSHAWN stated,

"Go around TT (SHERTARRA CATRON) house right and uh, put ten (grams of heroin) put a ten on the thing (scale) and Toot (heroin customer) gonna meet you around there, he gonna give you 850 (\$850) for the ten (grams of heroin)." DIVAUGHN said, "Okay."

86. On July 13, 2010, at approximately 9:13 p.m., RAYSHAWN LIGON called WILLIAM EFFORD on the telephone. EFFORD stated, "Shit, I'm on deck (ready to purchase heroin), I'm really ready though man, but the thing is though man, I don't want, they (EFFORD's heroin customers) keep telling me that shit (heroin) is always like a 5 or a 6 (quality out of 10)." LIGON said, "Hell no, not this right here what I got." EFFORD said, "You give it to me how you get it (uncut), I'll pay dollar for dollar." LIGON said, "I've got some new shit that's stupid (new supply of high quality heroin)." EFFORD stated, "Alright, I'm about to come get some right now, just get a tester real quick (EFFORD will bring someone to inject the heroin to test the quality). I'll be ready by tomorrow though for sure."

87. On July 13, 2010, at approximately 10:02 p.m., RAYSHAWN LIGON called SHERTARRA CATRON on the telephone. LIGON said, "Give a little bit, like point 3 (.3 grams of heroin to test)." CATRON said, "Man, who is this person, have I seen this person before?" LIGON said, "Yeah the dude D (WILLIAM EFFORD), he outside." CATRON asked, ". . . You said give him point 3?" LIGON said, "Yeah, point three (.3 grams) not three point zero

(3.0 grams), point three." (EFFORD brought a heroin addict to CATRON's residence to test LIGON's heroin).

88. On July 14, 2010, at approximately 1:03 p.m., RAYSHAWN LIGON called SHERTARRA CATRON on the telephone. CATRON asked, "Look somebody, how much you charge for three and a half (grams of heroin)?" LIGON said, "350 (\$350)." CATRON said, "He say he (CATRON's heroin customer) got three (\$300) now." LIGON said, "Alright, tell him to bring the three." CATRON said, "Ok. What you want me to do? I will tell him to meet me on Columbia now and bring me this money and I was going to get you the money and then I'll go give it (heroin) to him." LIGON said, "Alright."

89. On July 14, 2010, at approximately 2:54 p.m., PERRY Avery, JR. called RAYSHAWN LIGON on the telephone. During the conversation, Avery stated, "I'm about to blow down on you and shit." LIGON said, "LOU (DIVAUGHN LIGON) said he (drug supplier) calling at five?" Avery said, "Yeah, five. What did he say that was about though?" LIGON said, "Oh, yeah, that one shit, that oil (black tar heroin), that shit is the dumbest, the mother-load of that." Avery said, "I told you. . ." LIGON said, "Yeah, nigger did that shit (tested the heroin), that nigger called back and he couldn't even talk (LIGON's drug customer tested the black tar heroin and it was high quality). That shit murder. He said that shit murder, don't fuck with that."

90. On July 14, 2010, at approximately 3:07 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. During the conversation, NEAL put his Mexican heroin supplier, BRAULIO DIAZ on the telephone with LIGON. LIGON said, "What's up with you big homey? My guy waiting on this white dude to come so he could have him check it out (WILLIAM EFFORD brought a white guy to test the quality of the heroin - see ¶ 86 above) and see if he will fuck with it and then we should be done, if he fuck with it we be done (can sell the rest of the heroin supply)." BRAULIO DIAZ said, "Yeah, because we will go grab the other batch bro (transport another supply of heroin to Cleveland)." LIGON said, "Ok, alright, I'm just waiting on him to pull up." DIAZ said, "Alright, cool."

91. On July 15, 2010, at approximately 12:36 p.m., an Unknown Male (UM), aka T, called RAYSHAWN LIGON on the telephone. The UM said, "I got some people coming from WV. They will be here exactly at two o'clock. I have that shit for you (money), that ain't shit. But listen, that last music (last supply of heroin), my people (heroin customers) say that was like all the way terrible (poor quality heroin). They say that music was not sounding good at all. It ain't like you normally have (heroin you sold me in the past). They want a couple of gangsters (grams of heroin) they gonna be here at exactly two o'clock. You got some different music though (better quality heroin)?" LIGON

said, "Yeah, I got some different music. I got it, it's hard." The UM said, "I am going to need myself, but I need the music to be right." LIGON said, "Ok."

92. On July 15, 2010, at approximately 1:15 p.m., RUBY SEAGRAVES called RAYSHAWN LIGON on the telephone. During the conversation, LIGON asked, "What you got (how much money do you want to spend on heroin)?" SEAGRAVES replied, "A bill (\$100 to buy heroin)?"

93. On July 15, 2010, at approximately 2:28 p.m., RAYSHAWN LIGON called VINCENT PRICE on the telephone. During the conversation, PRICE stated, "Man, this shit (heroin) garbage (poor quality), Ble." LIGON asked, "What'd they (customers) say?" PRICE said, "They all don't like this shit . . ." LIGON asked, "You say all of them (all of PRICE's customers) say that? Man, that's crazy." Later, PRICE said, "Man, I can't do nothing with this shit D-Ray. Man, I need all, I wanna bring this shit back . . ." LIGON said, "Ok, I'm in the same spot."

94. On July 16, 2010, at approximately 12:44 p.m., RAYSHAWN LIGON called JULIUS CARSON, JR. on the telephone. LIGON asked, "What's up, where you at?" CARSON stated, "Right here, on, right with dropped me off down here, you should have dropped me off at home, but I was fittin' to meet have um, . . . meet Earl on Parmalee (Avenue) right quick, so I can sell him this strap (hand gun), Earl wants to sell this strap (hand gun) to a white boy. .

. Where you at?" LIGON said, "I'm going to the house, I need to grab that juice (drugs)." CARSON said, "Ah, okay, okay."

95. On July 16, 2010, at approximately 1:39 p.m., VINCENT PRICE called RAYSHAWN LIGON on the telephone. LIGON stated, "I'm about to let you come through and grab that picture (sample of heroin) in a few minutes. I'm coming from the west, my house . ." PRICE asked, "Man, is this good looking shit (better quality heroin) man?" LIGON replied, "Yeah, it is different shit, my word." PRICE replied, "Alright."

96. On July 16, 2010, at approximately 1:48 p.m., RAYSHAWN LIGON called NIAKENA K. HEARD on the telephone. LIGON said, "Come back real quick man, I gotta, I gotta, I gotta, I gotta nice play (heroin sale lined up) man." HEARD replied, "The way you said nice?" LIGON replied, "I got, I got, I got two niggas (two heroin customers) that want two (two ounces of heroin each)." HEARD asked, "Two whole joints (two ounces of heroin each)?" LIGON said, "Yeah." HEARD replied, "I'd rather go and get a boy, you know boy?" LIGON said, "I know you ain't riding like that (carrying heroin in the car), but I'm saying, no I want you to bring me ah a little tester thing (sample of heroin) back cause I'm going to have help come get it and then by the time you go grab them (the ounces of heroin), I know they're (the customers) going to want them. . ." HEARD replied, "Alright."

97. On July 16, 2010, at approximately 5:07 p.m., RAYSHAWN LIGON called LARRY NEAL on the telephone. NEAL asked, "Hey RAY, you got 500 (\$500) yet you said?" LIGON stated, "I'm about to have a grand (\$1,000) in two hours." NEAL said, "Ok, I'm going to give you his number (NEAL's Mexican heroin supplier, BRAULIO DIAZ' telephone number) and you call him and tell him then." LIGON said, "Ok, what is it?" NEAL said, "224 is the area code, 595-1995. I told him you had 500 but just let him know in a couple hours that you going to send a G (\$1,000) you not around with the 500 at or whatever. Call him now and tell him." LIGON said, "Alright, I'm about to right now."

98. On July 16, 2010, at approximately 5:15 p.m., RAYSHAWN LIGON called VINCENT PRICE on the telephone. LIGON asked, "What up bro, what they say?" PRICE said, "My one dude (heroin customer) said that shit (UI)." LIGON asked, "You said it was weak (poor quality heroin)?" PRICE stated, "Naw, I said my one dude who I got up to said it was a good 8 (8 out of 10 quality heroin)." LIGON asked, "It was a good 8?" PRICE said, "Yup."

99. On July 17, 2010, at approximately 12:58 p.m., NIAKENA K. HEARD called RAYSHAWN LIGON on the telephone. LIGON said, "I'm on my way down there, I got a dude (heroin customer) for the 14 cent (14 grams of heroin)." HEARD replied, "Shit, call me when you get close." LIGON said, "Alright."

100. On July 17, 2010, at approximately 1:11 p.m., RAYSHAWN LIGON called an Unknown Male (UM), aka T, on the telephone. The UM said, "I'm gonna need you though bleed, I was gonna be about 3:30. I need you to blow down on me a couple gangsters (grams of heroin) you hear me? It is the same mo (same quality heroin)?" LIGON said, "Yeah." The UM replied, "I need you though buddy, they (the UM's heroin customers) just hittin' the E way (freeway) so they be here about 3:30." LIGON said, "It's a bet."

101. On July 17, 2010, at approximately 2:14 p.m., RAYSHAWN LIGON called TERENCE C. HESTER on the telephone. LIGON stated, "Shit, I got a little 14 play (sale for 14 grams of cocaine) for you, a little play of 14, but I know the nigga (customer) going to grab two (ounces of cocaine), he just trying to see what I got. I had that bullshit (poor quality cocaine) last time, so he just trying to see if it cool. He probably grab like two (ounces) of them." HESTER said, "Alright." Approximately 13 minutes later, LIGON called HESTER again and stated, "Alright, just grab the whole 14 (grams), 'cuz I'll just get him on the next time he come for the two joints (two ounces)." HESTER replied, "Alright." Approximately five minutes later, LIGON called HESTER again and said, "Bring two more (ounces of cocaine), put them on the side alright?" HESTER asked, "Two 14's (two half ounces of crack cocaine) and two of the regular (two ounces of powder cocaine)?" LIGON said, "Naw, naw, naw, just

bring a 14 (half ounce of crack cocaine) and a regular too (an ounce of cocaine)."

102. On July 17, 2010, at approximately 2:18 p.m., RAYSHAWN LIGON called STETSON WHITE on the telephone. LIGON asked, "You got some of that tall in the hood?" WHITE replied, "BOOTY (JASON MORGAN) got that shit." LIGON said, "Oh, wow." WHITE said, "That nigga, I had gave him my whole little thing." LIGON said, "Oh, okay, okay, alright, I'm call him."

103. On July 17, 2010, at approximately 3:41 p.m., TERENCE C. HESTER called RAYSHAWN LIGON on the telephone. HESTER said, "That was only 11 (\$1,100 per ounce of cocaine/crack) nigga, you don't know how to count, you count all that money mother fucker and you still don't know how to count, you need to get a money counter. . . How long you think that nigga going to be (before he returns with the unknown male's money)??" LIGON said, "He about to run through them, he just wanted to see what it is (quality of the cocaine), cause he had the bread (money) on him for two (ounces of heroin), he said just give me a half (ounce of cocaine) right quick and let me see what is going on (quality of the cocaine). He got all kinds of licks (drug customers) lined up so he about to run through that (supply of cocaine), cause he probably come grab that as soon as he see what it is, soon they (drug customers) give him some reading." HESTER said, "Alright."

104. On July 17, 2010, at approximately 4:12 p.m., TERENCE C. HESTER called RAYSHAWN LIGON on the telephone. LIGON said, "Bring like five and half (ounces of cocaine) real quick, I have my dude (customer) sitting right here." HESTER asked, "Bring what?" LIGON stated, "Bring like five and a half real quick."

105. On July 17, 2010, at approximately 4:47 p.m., RAYSHAWN LIGON called NIAKENA K. HEARD on the telephone. LIGON said, "I needed like five (grams of heroin) right quick. I got my peoples (heroin customer) sitting right here." HEARD asked, "Where y'all at?" LIGON said, "By Empire, by Bloop's house." HEARD said, "I'll call you when I leave from here." LIGON said, "Alright."

106. On July 17, 2010, at approximately 5:05 p.m., RAYSHAWN LIGON called SHERTARRA CATRON on the telephone. LIGON said, "Naw, I don't need that, I've been fittin' to call you back, I don't need that. I need them two though, bring them two (grams of heroin). Where you at?" CATRON said, "I'm about to walk on 90th." LIGON said, "Alright, I'm about to come around there and grab that real quick." Moments later, LIGON arrived at CATRON's residence, 617 East 99th Street, #2, Cleveland, Ohio, driving his black Audi A8. CATRON exited the apartment building with a white bag and gave it to LIGON while he sat in his vehicle. LIGON then departed the area.

107. On July 17, 2010, at approximately 5:46 p.m., RAYSHAWN LIGON called JAMEL McHANEY on the telephone. LIGON said, "What's

up? I have you a nice little eight (heroin, quality eight out of ten), if you want to fuck with it." McHANEY asked, "For what (cost)?" LIGON said, "Just 90 a person (\$90 per gram)." McHANEY said, "I'll blow down there."

108. On July 17, 2010, at approximately 5:48 p.m., BRAULIO DIAZ called RAYSHAWN LIGON on the telephone. DIAZ asked, "You need a name (to wire transfer money), you need his name already or what?" LIGON said, "Yeah, he gave me a nickel (\$500), I'm waiting on him (LIGON's drug customer) to bring the other (money), you can text (the name to wire transfer the money to) that info though. You want me to send a nickel (\$500) now or what?" DIAZ said, "Yeah, I'm gong to need it right now because I got to give this guy, and there going to need me to send it so I can get money for them to go back (the Mexican suppliers need to travel to get another shipment of heroin). I think about only ten. Only thing cause I don't know how long, how long does it take to get all ten (\$1,000)." LIGON said, "I was going to give him a couple of hours." DIAZ stated, "That will be fine, then send me the nickel (\$500) and call me when you get to the Western Union so I can give your name (the name to wire transfer the money to)."

109. On July 17, 2010, at approximately 5:58 p.m., RAYSHAWN LIGON called BRAULIO DIAZ on the telephone. DIAZ stated, "R, O, B, E, R, T, O." LIGON asked, "Ok, last name?" DIAZ said, "S, O,

T, E, L, O." LIGON asked, "Chicago, right?" (LIGON is wire transferring money to NEAL's Chicago-based Mexican heroin supplier in another name).

110. On July 17, 2010, at approximately 7:43 p.m., an Unknown Male (UM), aka Amigo, called RAYSHAWN LIGON on the telephone. The UM asked, "Hello, this is RAY? I'm calling for money sent to Roberto (Roberto Sotelo)." LIGON said, "Yeah, there was 500 there." The UM stated, "Yeah, but what is your last name? Cause TONY (BRAULIO DIAZ) didn't get the last name right." LIGON said, "LIGON, L, I, G, O, N."

111. On July 17, 2010, at approximately 8:11 p.m., an Unknown Male (UM), aka Amigo, called RAYSHAWN LIGON on the telephone. The UM stated, "They don't want to give me the money order because you misspelled my last name." LIGON asked, "I misspelled the last name? S, O, C, E, L, O?" The UM replied, "S, O, T, E, L, O." LIGON asked, "T not C?" The UM replied, "T as in table." LIGON said, "Alright, I'm about to go back up there." The UM asked, "And then your name, what is your whole name, because they say RAY is not just it." LIGON said, "RAYSHAWN, R, A, Y, S, H, A, W, N."

112. On July 18, 2010, at approximately 6:36 p.m., RAYSHAWN LIGON called VINCENT PRICE on the telephone. PRICE said, "That shit (heroin) was different you gave me from that sample." LIGON replied, "Yeah, yep, yep, that's what I told that nigga, I said

that shit is different from last, he say, 'yeah, that's fire right there.' So that was better than the sample, right?" PRICE replied, "I don't even know. I haven't been asking them (heroin customers) like they say the sample was a nine (out of ten for quality)." LIGON said, "Oh yeah, ok." PRICE said, "And I ain't really been asking them about this, but my one nigga (customer) ain't been back."

113. On July 18, 2010, at approximately 9:41 p.m., RAYSHAWN LIGON called TERENCE C. HESTER on the telephone. During the conversation LIGON stated, "About ready to leave the house, LOU (DIVAUGHN LIGON) called me and he going to grab those two joints (two ounces of cocaine) tomorrow. . . I got a little play (drug customer wanting cocaine)." HESTER said, "I'm in the hood." LIGON asked, "Alright, . . . a little basketball (3.5 grams of cocaine)." Approximately 54 minutes later, LIGON called HESTER again and asked, ". . . You already went and grabbed it (cocaine)?" HESTER replied, "Yeah." LIGON said, "Alright, I'll meet you at 105 (Street)."

114. On July 19, 2010, at approximately 12:01 a.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. NEAL asked, "Did you send my man that money?" LIGON said, "I sent him a nickel (\$500), they went and got that, I told him as soon as he come in with the rest, I'm gonna send the other nickel." Later in the conversation, LIGON stated, "I'm about to hollar at my one dude

(heroin customer) right now, he been hollering at me like, try and make it better and try and make me something on the back burner side right. So I told him shit you know shoot me like thirty (\$30,000). I broke it down for him you know we make something you know what I'm saying. So what I'm going to try and do, if he shoot me the thirty grand (\$30,000) tomorrow or something, I'm going to call you and let you know so that way you can tell them (Mexican heroin suppliers) to give you a whole joint (one kilogram of heroin) and we have 30 (\$30,000) on, you know what I'm saying, and we will pay the other 40 (\$40,000) back (\$70,000 total payment for one kilogram of heroin)." NEAL said, "Let me know then."

115. On July 19, 2010, at approximately 2:20 p.m., an Unknown Male (UM), aka T, called RAYSHAWN LIGON on the telephone. During the conversation, The UM stated, "I need, I need a gangster and a hizzazz (one and a half grams of heroin) though, my folks (customers) about to get off the E-way (freeway) about an hour or so." LIGON said, "I'm gonna slide down there."

116. On July 19, 2010, at approximately 5:55 p.m., a maroon Chevy bearing West Virginia license plate number 3LEZ78, registered to David (a person known to the Grand Jury), in Kanawha, WV, arrived at the residence of an unknown male, aka T, 1811 East 99th Street, Cleveland, Ohio. The vehicle parked in front of the residence and several individuals exited the vehicle

and entered the residence. Moments later, RAYSHAWN LIGON arrived at the residence and met with individuals on the front porch of the property. Several minutes later, LIGON departed along with the maroon Chevy. The maroon Chevy was later stopped by Ohio State Highway Patrol (OSHP) Officers. During a subsequent search of the vehicle, a small plastic bag, which had been ripped open, was found and heroin residue was observed spread across the back seat of the vehicle.

117. On July 20, 2010, at approximately 12:52 p.m., RAYSHAWN LIGON called KYRON MARLIN on the telephone. LIGON asked, "Where you at?" MARLIN replied, "I'm chilling, about to shoot downtown to meet one of my licks (heroin customers) and shit." LIGON said, ". . . I might need to grab a couple of (heroin), I got a little play (sale) I need to hit." MARLIN replied, 'Okay, okay, let me, uh, let me shoot up, let me shoot, matter of fact you can, oh no, I'll do it. I'll do it. Just let me, um. Let me shoot down there. I'm gonna shoot back up here. I'm gonna call you when I get back in the hood." LIGON replied, "Alright."

118. On July 20, 2010, at approximately 3:06 p.m., RAYSHAWN LIGON called KYRON MARLIN on the telephone. LIGON asked, "A couple more people (heroin customers) called me. You got like a, what you got, you got like a zip (an ounce of heroin)?" MARLIN replied, "Shit, I ain't quite that though no more. It damn near

that. Man, let me, matter of fact, if I'm gonna do, I'ma hit, I'ma hit the other dude (another supplier), I'm gonna have him bring the shit (heroin), bring the shit to you. You just do what you want. See if we do it, okay?" LIGON said, "Alright."

119. On July 20, 2010, at approximately 5:09 p.m., BRAULIO DIAZ called RAYSHAWN LIGON on the telephone. DIAZ said, "It's me, TONY." LIGON stated, "I'm about to go up there (wire transfer store). He on his way to me. I'm about to call you with the confirmation number (wire transfer confirmation number) in a minute. Listen, I got a guy (heroin customer), right. He gonna give me thirty grand (\$30,000)." DIAZ stated, "Ok." LIGON continued, "So what we trying to do it, I was going to try to do it with you, do the whole thing (one kilogram of heroin) and then I give you thirty (\$30,000) on it and then I just owe forty (\$40,000). But I have thirty grand cash in my hand though, soon as you come in (with a shipment of heroin)." DIAZ said, "Ok. But you gotta send me back, you gotta send some money because I'm really short right now. I need that nickel (\$500) so I could have my transportation money, you know (DIAZ needs transportation money to bring another shipment of heroin to Cleveland)." LIGON said, "I'm about to send that to you now."

120. On July 21, 2010, at approximately 11:43 a.m., RAYSHAWN LIGON called SHERTARRA CATRON on the telephone. LIGON asked, "Where are you?" CATRON stated, "On Columbia." LIGON

said, "Alright, I'm about to come and give it to you. . . Well, you got the stuff (heroin) with you?" CATRON said, "No, I left one (package of heroin) in the red container and the other (package of heroin) is inside a flower bed wrapped up in paper." LIGON said, "Why the hell y'all ain't bring that shit?" CATRON asked, "You want me to go get it?" LIGON said, "Yeah, go get it right quick." CATRON said, "Alright."

121. On July 21, 2010, at approximately 1:26 p.m., an Unknown Male (UM), aka Roberto Sotelo, called RAYSHAWN LIGON on the telephone. Sotelo left LIGON a voice mail message which stated, "This is Roberto, TONY's friend (BRAULIO DIAZ, LIGON's main heroin supplier). TONY said you suppose to put some paper for me (send some money to me). When you got time call my phone number or TONY's phone (224-595-1995). Bye."

122. On July 21, 2010, at approximately 2:11 p.m., BRAULIO DIAZ, aka TONY, called RAYSHAWN LIGON on the telephone. DIAZ said, "Yeah RAY, this TONY." LIGON said, "I'm in route to the store (to wire transfer money), I'm about to call you, how you spell the last S,O,T,E,L,O, right?" DIAZ said, "Yeah, just write it down and call me when you have the correction shit (confirmation number). I need that (money) for transportation, that's all I need (to transport a shipment of heroin)."

123. On July 21, 2010, at approximately 4:08 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. LIGON said, "I just

sent that bread (money to DIAZ) though." NEAL asked, "You just sent the bread to them? That's basically what I was calling for." LIGON said, "Yeah, so you all should be down, you all should be coming back down (to Cleveland with a heroin shipment) in a minute." NEAL said, "Right, right, right." LIGON said, "I got my man (heroin customer), I told you my man got \$30,000 for them (Mexican heroin suppliers). My dude, he wanna, you know what I'm saying, he wanted to fuck with me. I told him, I said alright cool. He said you got that (\$30,000) whenever. I'm just telling, bring the whole thing (kilogram of heroin) and then we just be, then we will just owe him 40 (\$40,000)." NEAL asked, "That's what you told them?" LIGON said, "Yeah, that's what I said. Bring the whole thing and we will owe you 40. We will have 30 on deck soon as you get in here." NEAL said, "I'm going to talk to them then." LIGON said, "Make sure it's the pow, wow."

124. On July 22, 2010, at approximately 2:38 p.m., RAYSHAWN LIGON called KYRON MARLIN on the telephone. LIGON asked, "Eh, you know, it's like 22 (grams) of that thing (heroin). What, you need it or something?" MARLIN asked, "What?" LIGON said, "You need it (heroin)? It's still like 22 (grams) of that thing." MARLIN replied, "Yeah, shit, I got, I, I, I run it all passed you. You know that's what holding my dude (MARLIN's supplier)

up. That's his shit (heroin). " LIGON asked, "Who, Red?" MARLIN said, "Yeah."

125. On July 22, 2010, at approximately 4:35 p.m., an Unknown Male, aka T, called RAYSHAWN LIGON on the telephone. LIGON asked, "What you trying to do?" The UM said, "I need a couple half of gangsters (half grams of heroin)." LIGON said, "Two halves, need two halves?" The UM said, "Yes sir."

126. On July 22, 2010, at approximately 7:44 p.m., RAYSHAWN LIGON called NIAKENA K. HEARD on the telephone. LIGON asked, "Where you at?" HEARD replied, "Like what though 'cuz, I'm light weight dead (almost out of heroin)." LIGON said, "Oh, for real? Well, shit, at least bring a zip (an amount of heroin) right quick." HEARD replied, "Oh." LIGON said, "About 14 (grams of heroin)." HEARD replied, "Hell no, I'm light weight dead one hundred shit (I'm almost out of the good heroin), take this little. . . I probably have one or two on the gangster (one or two grams of heroin) sell." LIGON replied, "Right, right, right, damn." HEARD said, "I been hitting (calling) this nigga (HEARD's heroin supplier) for like two days . . . I can call, shit, let me call. Stand by your phone, let me see, stay on your phone real quick." LIGON said, "Alright."

127. On July 23, 2010, at approximately 7:46 p.m., DIVAUGHN LIGON called RAYSHAWN LIGON on the telephone. DIVAUGHN asked, "What up? How many of them joints (a quantity of heroin) we gone

need?" RAYSHAWN replied, "Five (an amount of heroin)." DIVAUGHN asked, "Like five of them?" RAYSHAWN replied, "Yep." DIVAUGHN asked, "They (customers) out there?" RAYSHAWN replied, "They on their way right now."

128. On July 24, 2010, at approximately 1:50 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. During the conversation, NEAL said, "I'll be back up there (Cleveland) Tuesday man. I'll be up there by Tuesday, ain't get something (heroin) from dude (NEAL's Mexican heroin supplier), I got something from somebody else, I got with my other guy (NEAL's alternate heroin supplier), I got to get something stronger (better quality heroin)." LIGON asked, "It's stupid, it's crazy (high quality heroin)?" NEAL said, "That shit (heroin) they got ain't right (poor quality heroin), I can't fuck with them, I can't make no money off that shit (poor quality heroin). I'm back on another page (alternate heroin supplier) on something else." LIGON asked, "He had it crazy though, it was straight?" NEAL said, "Naw, what they (Mexican suppliers) got people don't like it, he working on it though, I told him I'm breaking out about Tuesday or Wednesday, cause my other guy called me so I have to get back up there. I know the first coming up (first of the month), I'll be up there." LIGON said, "Alright."

129. On July 24, 2010, at approximately 8:04 p.m., RAYSHAWN LIGON called Kevin (an individual known to the Grand Jury) on the

telephone. Kevin stated, "I was talking to LOU (DIVAUGHN LIGON) and shit, that nigga Wayne (an individual known to the Grand Jury), you all got to get that nigga up out of here man. I was just riding up Superior, that nigga blew down like, he like pull over man. That nigga was like man, he like Kev, he like man, I ain't even going to lie, he like man, if you were RAY (RAYSHAWN LIGON) man, I was going to put 7 or 8 of them in this bitch (shoot 7 or 8 rounds into LIGON's vehicle that Kevin was driving) man. . . and them niggas he (LIGON) sent after me, if that nigga try that again I'm going on Adams (to shoot LIGON's relatives that live on Adams Avenue)." Later in the conversation, Kevin said, "I got to playing with my phone trying to text LOU but, that nigga hopped into the whip (vehicle) and shit. He telling me the story about how he got (shot at by LIGON's associates), about the story right there, nigga I (Kevin) set that up (drive-by shooting attempt)." LIGON asked, "He said he got hit though." Kevin said, "Naw." Later in the conversation, LIGON was overheard speaking to JULIUS CARSON, JR. and stated, "The nigga Wayne that we was shooting at and shit, the nigga that hit me for the ten stack (purchased \$10,000 worth of heroin from LIGON with fake money), Kev said nigga just pulled up on him. . ."

130. On July 24, 2010, RAYSHAWN LIGON and his father, JULIUS CARSON, JR. drove to Chicago, Illinois, to meet with one of LIGON's heroin suppliers.

131. On July 27, 2010, at approximately 3:45 p.m., RAYSHAWN LIGON called NIAKENA K. HEARD on the telephone. LIGON asked, "You comin' back?" HEARD replied, "Yeah, in a second." LIGON said, "Yeah, I got a little basketball play (sale for 3.5 grams of heroin)." HEARD replied, "Alright."

132. On July 27, 2010, at approximately 6:07 p.m., RAYSHAWN LIGON called DIVAUGHN LIGON on the telephone. RAYSHAWN asked, "What up?" DIVAUGHN said, "I had a little 100 lick (\$100 sale of heroin)." RAYSHAWN asked, "Oh, you did? Where you at boy?" DIVAUGHN replied, "I'm right on 71st (Street), I'm about to bleed right now." RAYSHAWN replied, "Oh, okay, okay . . ."

133. On July 28, 2010, at approximately 6:07 p.m., DIVAUGHN LIGON called RAYSHAWN LIGON on the telephone. RAYSHAWN asked, ". . . Where you at though? I, I need a, uh, I need you to put the, out the play down for me though (make a heroin sale for me) . . . man, man like man like two grandmas (two grams of heroin), put uh, put a little one and a half (grams of cut) on it (heroin) and hit my little bally lick for me (make the heroin sale for me)." DIVAUGHN replied, "Where's at?" RAYSHAWN said, "He (the customer), um, I'm about to have him meet you and shit . . ." DIVAUGHN replied, "Alright."

134. On July 29, 2010, at approximately 1:26 a.m., VINCENT PRICE called RAYSHAWN LIGON on the telephone. PRICE said, "Show me can dip little bit though." LIGON replied, "Aight, yeah, soon

as he comes, yeah, I'll hit you back." PRICE asked, "What color is that shit (heroin)?" LIGON replied, "Brown, hello . . . yeah, brown." PRICE asked, "That black, brown shit?" LIGON said, "Uhhh, sorta, yeah, sorta."

135. On July 29, 2010, at approximately 10:48 a.m., TRAVON WILLIAMS called RAYSHAWN LIGON on the telephone. During the conversation, LIGON said, "I'm gonna take care of you today boy." WILLIAMS replied, "Yeah, you dogged me last time man. Naw, hell no man, they (drug customers) ain't like that shit (heroin) at all." LIGON asked, "They were not liking it at all?" WILLIAMS replied, "Hell, they hated it. . . I still got that shit (heroin)." LIGON said, "Oh yeah, we could do something with that too. I'm about to get this powerful shit (high quality heroin) in a few minutes. . ." They agreed to meet later.

136. On July 29, 2010, at approximately 3:30 p.m., RAYSHAWN LIGON called KYRON MARLIN on the telephone. During the conversation, LIGON asked, "See whatchucallit (MARLIN's heroin supplier, Red), tell him I got a little seven play lick (a heroin customer who wants to buy 7 grams) right here." MARLIN replied, "Uh, oh, uh, oh, uh, a Ray, uh Red?" LIGON said, "Yeah." MARLIN replied, "Alright, let me call this phone, I gotta call this other phone, hold on." On a different phone, MARLIN placed a call to Red and said, "You comin' back up the way? Up our way? Stop up, stop up at Empire (Street) DIRTY (LIGON) got somethin'

for you, he said c'mon now." MARLIN then said to LIGON, "DIRT, DIRTY, yeah, he on his way now. He comin', he comin' from, uh, he comin' from Payne (Avenue), he on his way now." LIGON replied, "Okay, alright."

137. On July 31, 2010, at approximately 9:30 a.m., DIVAUGHN LIGON called RAYSHAWN LIGON on the telephone. DIVAUGHN said, "Game (Jimmie, an individual known to the Grand Jury)." RAYSHAWN asked, "Game came and it (RAYSHAWN's Audi A8)?" DIVAUGHN replied, "Hell yeah, . . ." RAYSHAWN asked, "Where at?" DIVAUGHN said, "Down by the Gotcha (a bar) and shit. I wouldn't have gotten out of that bitch (the car) if I would have knew that." RAYSHAWN said, "Hell naw, where he, how he do it?" DIVAUGHN said, "He had a key or something and shit, he got the fucking hammer (DIVAUGHN's .45 caliber pistol), the hammer was in that bitch (DIVAUGHN had a gun in the Audi A8 when it was repossessed). . . It didn't get towed, five minutes after we walked the door (into the bar) . . . got it with a key, hammer was in that car."

138. On July 31, 2010, at approximately 11:02 p.m., RAYSHAWN LIGON called LARRY NEAL on the telephone. NEAL said, "I had sent my girl up there (to Cleveland) man to go retrieve that little money from dude (NEAL's other Cleveland heroin customer, ERNEST HARRIS) man cause I didn't feel like drivin' man. So they up there where you at, you know what I'm saying. I'm suppose to

get up with dude (NEAL's Mexican heroin supplier) tomorrow maybe they said they got something better (higher quality heroin) in, so we'll see." LIGON said, "You talking about Amigo (NEAL's Mexican heroin supplier), what's his name. You talking about Amigo?" NEAL said, "Yeah, Amigo. He got a new number (telephone number) that's why you probably couldn't get him he said. He called me from a new number. I'm definitely get up with him tomorrow sometime and see what the fuck going on. I'll give you a hollar and let you know what's up." LIGON said, "Alright."

139. On August 2, 2010, at approximately 2:39 p.m., Jimmie (an individual known to the Grand Jury) called RAYSHAWN LIGON on the telephone. LIGON said, "Damn, why you do me like that (repossess my car)?" Jimmie replied, "Your boy just got back in town. What happened after that, I think there's a tracker (a GPS device) on that car bro. Once he get it Friday night, Saturday morning, those people (police) were up there searching the car." LIGON asked, "What people?" Jimmie replied, "You heard me." LIGON said, "You talkin' about them people up there searchin' the car?" Jimmie replied, "Saturday morning, they waited for him." LIGON asked, "Where do they have it at?" Jimmie replied, "Where ever his shop is." LIGON asked, "Who was the dude?" Jimmie said, "He worked for me through Audi. I was calling to you to meet me at Willis' office. I'll holla at you."

140. On August 3, 2010, at approximately 8:43 p.m., LEONARD YOUNG called RAYSHAWN LIGON on the telephone. During the conversation, YOUNG said, "I got somebody (customer) who wants to get some tonight, hold, hold on." YOUNG then put an Unknown Male on the telephone with LIGON. The Unknown Male stated, "Ah, I'm trying to make a move (sell drugs) you know, but um, I want to make sure it ain't no garbage (poor quality drugs) or whatever." LIGON said, "Right, yeah, it's all good (drugs are high quality). SNOOP know what it is, what I got going on (YOUNG knows LIGON's drugs are good). I got a nice thing (drug business) going on." The unknown male said, "Alright, so I'm goin' to see what they (drug customers) goin' to do or whatever and I'm going to have SNOOP hit you right back." LIGON said, "Ok, ok."

141. On August 3, 2010, at approximately 8:55 p.m., LEONARD YOUNG called RAYSHAWN LIGON on the telephone. YOUNG said, "I'm right here on Parmalee with these people (heroin customers)." LIGON asked, "Ok, what they want?" YOUNG said, "They want to get two gangsters (two grams of heroin)." LIGON said, "Alright, I'm right here on Empire."

142. On August 5, 2010, at approximately 4:59 p.m., LARRY NEAL called BRAULIO DIAZ on the telephone. NEAL stated, "As soon as his (ERNEST HARRIS') girl get off, he going to send it. I want you to call my man (HARRIS) anyway, the old man I was telling you about that we messing with (selling heroin to) so he

can tell you what's going on too, cuz he fittin' to send the money but, I ain't got to lie to you and nothing like, he trying his best to get rid of it (sell poor quality heroin), but if I have to go back (to Cleveland) and get it, I told him I am going to have my guy (DIAZ, who is NEAL's Mexican heroin supplier) call you man, so you can explain it too." DIAZ said, "He is going to send some money today, right?" NEAL said, "Yeah, but I still want you to talk to him, this is the old man (HARRIS). That is who I should have messed with from the get go man instead of fucking with RAY's (RAYSHAWN LIGON) ass." DIAZ said, "I'm kinda busy right, tell him I'll call him later on seven or something. My son is with me, I could send my son to the place (Cleveland) they change (the heroin)." NEAL said, "Trust me, this shit (poor quality heroin) threw us back. . . I feel like I was in Cleveland, just sleeping everyday."

143. On August 5, 2010, at approximately 5:16 p.m., LARRY NEAL called ERNEST HARRIS on the telephone. NEAL said, "Yeah, I gave him the number he say he is going to call about 6 or 7 when he get off from work, he working on some big house, at that address I gave you, St. Charles, Illinois." HARRIS said, "On the thing?" NEAL said, "Because that is where he wanted me to send the money to St. Charles, Illinois, that is why I put it in the phone. He not in Chicago but he in the suburbs, but I don't know what suburbs that this. He said he was going to call you because

like I told him man this is the guy I should of messed with, this my main man, I knew you all wasn't really giving me nothing really yet to front out so I really couldn't do nothing so I went and messed with them other niggas on 105th."

144. On August 5, 2010, at approximately 8:27 p.m., LARRY NEAL called BRAULIO DIAZ on the telephone. DIAZ said, " . . . They're going to close the place over here (money exchange store)." NEAL said, " . . . I'm still waiting on, I still, he (ERNEST HARRIS) said he gonna send it (wire transfer money) man, I don't know what the other dude's (RAYSHAWN LIGON) doing man, you know what I'm saying. He said he gonna send it man, I'm waiting patiently, man. But definitely man, Saturday man, I'm going up there (Cleveland) man, you know what I'm saying and whatever he don't sell (heroin), I'm just gonna bring it back man. . . That way, uh, cause you said you have sales for it (heroin) . . ." DIAZ said, "I'll be right here waiting."

145. On August 6, 2010, at approximately 9:27 a.m., RAYSHAWN LIGON called VINCENT PRICE on the telephone. LIGON said, "Alright man, listen, I found this stupid shit (high quality heroin), and I ain't gonna touch (cut) it. But you got it, but it's, it's, that shit is expensive. I gotta get 4 cent of basketballs (\$400 for 3.5 grams of heroin) for these." PRICE replied, "Yeah." LIGON stated, "But it's straight raw (high quality), you could, you could put a half on this shit yourself

(cut it by one half and double the amount). You could really take it all the way. I, I put a half on it, it was still 9-10 (quality). I put a, I put a whole gram on a gram and it was 7/8ths (quality)." PRICE asked, ". . . What's the numbers (price) though?" LIGON replied, "It's, it's gonna be, it's gonna be 4 cent (\$400) a basketball (3.5 grams), so that's like 32 (\$3,200 per ounce). And it's straight raw." PRICE asked, "And it's 400?" LIGON said, "And it's straight raw. Yeah, yup, 400 for a ball (3.5 grams)." PRICE said, "Oh, ok, ok, I see, it's 32 (\$3,200 per ounce)." LIGON said, "Yup." PRICE stated, "Alright, I'm gonna come get to me a picture (sample) of it right now."

146. On August 6, 2010, at approximately 1:55 p.m., RAYSHAWN LIGON called TRAVON WILLIAMS on the telephone. LIGON said, "I'm gonna need a couple of them joints (an amount of heroin) right quick, man. I got my man (customer) over here at the house . . ." WILLIAMS asked, "Well, uh, they liked it (heroin)?" LIGON replied, "Yeah, yeah, well, for real, I ain't even, but from what Dollar (heroin customer) had told me, you know what I'm saying? His people (customers) . . . it's great, you know, I just promoted it like that and I ain't even, I ain't even gonna whack (cut it) it. What I'm gonna do is I'm gonna take the number up to 32 (\$3,200 per ounce of heroin), just make me a quick four (\$400) off each one. 'Cuz I already know niggas gonna be buying a couple (ounces), so I'm gonna end up making a

couple thousand. You know what I'm saying?" WILLIAMS stated, "Alright." Later, LIGON said, 'Yeah, so I got my nigga (VINCENT PRICE) right here, right now. He want two (ounces) though. . . just bring like two more so I can have one still to keep going, you know what I'm saying, but I'm 'bout to give the bread (money) for the two right now, he (PRICE) at my house." WILLIAMS replied, "Alright, give me a second."

147. On August 6, 2010, at approximately 7:32 p.m., DARRELL HAYNES called RAYSHAWN LIGON on the telephone. HAYNES said, "Hey, someone (drug customer) trying to buy a basketball (3.5 grams of heroin) man. . . I'm talking about somebody want a basketball nigga, a basketball." LIGON replied, "Oh yeah. Yeah, I'm about to have LOU (DIVAUGHN LIGON) do it (sell it), my fault."

148. On August 6, 2010, at approximately 9:02 p.m., LARRY NEAL called BRAULIO DIAZ on the telephone. During the conversation DIAZ asked, "You talk to your guy over there (ERNEST HARRIS in Cleveland)?" NEAL said, "Uh, no. He said tomorrow he's supposed to send something else man (wire transfer money to DIAZ), but he told me if I wanna come get it (poor quality heroin previously supplied to HARRIS), cause I need somethin' stronger (better quality heroin), it's up to me, I just didn't feel like goin' to get it and then, you know what I'm saying, I'm just tired of runnin' back and forth." DIAZ said, "As long as, you

know, he going to send it (money) like every three or week or something, got to make it soon." NEAL said, "But at the same time bro, I got this vehicle, it's real, it's nicer than the other one, (NEAL wants to give DIAZ a vehicle to pay off his drug debt) we got to do something man, cause I'm missing money just waitin' around not doing nothin' . . ." DIAZ said, "Okay, it'll definitely be Sunday over there."

149. On August 6, 2010, at approximately 1:38 p.m., LEONARD YOUNG called RAYSHAWN LIGON on the telephone. During the conversation, LIGON said, "Hell yeah, I got some raw shit (high quality heroin) and I'm banging (selling) that shit. 120 (dollars) a gram to niggas and I ain't even whacking (cutting) my shit no more. Niggas gotta pay 120." YOUNG replied, "Bring me a picture (sample)." LIGON responded, "I'll be back down."

150. On August 6, 2010, at approximately 4:56 p.m., RAYSHAWN LIGON called DIVAUGHN LIGON on the telephone. RAYSHAWN said, "Hey, I got a little basketball player (3.5 grams of heroin) he gonna be four cent (\$400.00)." DIVAUGHN asked, "He what?" RAYSHAWN said, "He gonna be four cent. . . he gonna give you four cent (RAYSHAWN wants DIVAUGHN to sell 3.5 grams of heroin to his customer and charge him \$400)." DIVAUGHN replied, "Alright."

151. On August 7, 2010, at approximately 11:20 a.m., RAYSHAWN LIGON called TRAVON WILLIAMS on the telephone. LIGON

said, "Yeah, hey, um, he (customer) said he's gonna call me later. He said he's gonna finish that up (selling heroin), the one (ounce of heroin) he got yesterday, then he's gonna grab them two (ounces of heroin)." WILLIAMS replied, "Alright."

152. On August 7, 2010, at approximately 5:44 p.m., LARRY NEAL called ERNEST HARRIS on the telephone. During the conversation, HARRIS said, "I just sent him (BRAULIO DIAZ) that (money for heroin) yesterday LARRY." NEAL replied, "Right, right. . . Alright, so, so, basically what you can do is sell it (poor quality heroin) or you can't sell, what you want me to do?" HARRIS replied, "Today, I ain't did nothing, zero, nobody (heroin customers) came today, no fucking body." NEAL said, "Right, so they (heroin customers) don't like you basically." HARRIS said, "Right. It's like so, so, mother fuckers you know man, they get so ill (from heroin withdrawal), if they got nowhere else to go, then they'll come to me." NEAL said, "Right, you last, you last resort."

153. On August 7, 2010, at approximately 8:35 p.m., LEONARD YOUNG called RAYSHAWN LIGON on the telephone. YOUNG said, "I need two grandmas (two grams of heroin)." LIGON replied, "I'm on Adams (Street), you know what they gonna be right (cost)?" YOUNG said, "Alright, alright."

154. On August 8, 2010, at approximately 3:36 p.m., RAYSHAWN LIGON called JASON MORGAN on the telephone. During the

conversation, MORGAN asked, "Can I get two (grams of heroin) for 225 (dollars) brother? . . . Can I get two for the 225?" LIGON replied, "Shoot, alright."

155. On August 9, 2010, at approximately 1:59 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. During the conversation, NEAL said, "Trying to make something happen. I only got that same shit (poor quality heroin) in my possession and I've been selling it like here and there you know what I'm saying, like one (ounce of heroin) here, two there." LIGON said, "That is how it was for me. I'm glad you see that though, that is how it was for me. You were like, you ain't got no dust, man listen, I've done two or three, and that was it. I'm glad you see the foot work I was putting in, cause I was looking stupid like damn man this shit (poor quality heroin) making me look bad as fuck." NEAL said, "They (heroin customers) buying it though, shit I mean it's selling slow but you know." LIGON said, "That's what I said, but the mother fuckers that buy big (drug customers that buy large amounts of heroin), they ain't going to fuck with it (poor quality heroin)." NEAL said, "Yeah, yeah, yeah, definitely the people that buy big ain't going to fuck with it." Later in the conversation, LIGON said, "That's what I said. We would rather do it like that, figure we can at least do three cents (sell three ounces of heroin a day) in a day or two, that's nine racks (\$9,000) at least. We can do 150 a day now, shit we

should be able to do 150 (sell 150 grams of heroin per day)."

NEAL said, "I'll let you know something before the weekend."

156. On August 9, 2010, at approximately 2:39 p.m., RAYSHAWN LIGON called PERRY AVERY, JR. on the telephone. During the conversation, AVERY stated, "You know I got these niggers (heroin customers in Dayton, Ohio) man right now, you workin' the fuck outta me boy. . . I got these niggas (customers) ready to spend these ends (money) man. They gonna come up there (to Cleveland) with me and shit and they gonna come get one (ounce of heroin), like, uh, shit, ya feel me? Want that grey shit (high quality heroin), you still got that shit?" LIGON replied, "Hell yeah I still got that shit." AVERY said, "Alright, they gonna come get that shit later, you gonna see man, you know, these niggers will be moving (selling) this shit down this bitch (in Dayton) like a mother fucker man."

157. On August 9, 2010, PERRY AVERY, JR. attempted to transport in a vehicle approximately two ounces of heroin he had received from RAYSHAWN LIGON to Dayton, Ohio.

158. On August 9, 2010, at approximately 6:07 p.m., JASON MORGAN called RAYSHAWN LIGON on the telephone. MORGAN asked, "What (how much heroin) you got left?" LIGON replied, "Like, um, like 11 (grams of heroin)." MORGAN asked, "11 of em?" LIGON replied, "Yeah." MORGAN said, "I'm gonna need them." LIGON said, "Alright, come on then, on Adams (Street)."

159. On August 9, 2010, at approximately 7:53 p.m., RAYSHAWN LIGON called JAMEL McHANEY on the telephone. During the conversation, McHANEY asked, "Yea, you got the same hit (heroin)?" LIGON replied, "Hell yea." McHANEY said, "Alright, I'll be down there. I'm done with that shit for real, I was just staying down for the day." LIGON said, "I got like two of them (ounces of heroin) sitting right here for ya." McHANEY replied, "Alright, I'll be down there."

160. On August 10, 2010, at approximately 11:19 a.m., DONTJOYE KEVIN FEELINGS called LARRY NEAL on the telephone. FEELINGS said, "But, uh, I got this picture (sample) of Harry's (heroin) wedding, they (the heroin suppliers) supposed to meet out there about tomorrow evening or something like that." NEAL said, "Okay." FEELINGS said, "Okay, okay, as soon as I get the picture of Harry's wedding, I'll tell you to come on down (to Minnesota)." NEAL said, "Okay." FEELINGS said, "I say, I should get the picture around tomorrow evening or something like that." NEAL said, "Okay then."

161. On August 10, 2010, at approximately 12:15 p.m., RAYSHAWN LIGON called JAMEL McHANEY on the telephone. LIGON asked, "You want me to bring both of these (an amount of heroin) out or what?" McHANEY replied, "Bring one and a half (1.5 ounces of heroin)."

162. On August 10, 2010, at approximately 12:24 p.m., RAYSHAWN LIGON called KYRON MARLIN on the telephone. During the conversation, LIGON said, "I'm on my way down there, I'm about to do somethin' else, but I have this, this, this uh, half time (half ounce of heroin) for you and shit." MARLIN asked, "Right, what it like (how's the quality) though man?" LIGON said, "Same thing (from last time)." MARLIN asked, "It's the same joint?" LIGON replied, "Yeah." MARLIN said, "They (MARLIN's customers) ain't really feelin' (don't like) that shit (heroin). I spoiled them with the other shit (higher quality heroin), I spoiled them with that other shit, so they feelin' it. . ." LIGON replied, "Oh yeah? . . . Alright."

163. On August 10, 2010, at approximately 3:43 p.m., RAYSHAWN LIGON called JAMEL McHANEY on the telephone. During the conversation, McHANEY said, "Man, last time I put some shit on my shit (added cut to the heroin purchased from LIGON), I just gave my people (drug customers) this shit (heroin), they said this shit ain't nothin' (poor quality). It's got all in the spoon (it doesn't melt correctly) and all that, man." LIGON asked, "It got what, bro?" MCHANAY said, "Is foam all in the spoon and all that. The last shit (a previous heroin purchase) ain't do that with the shit (cut) I put on there." LIGON said, "Man, I'm gonna bring another one (an ounce of better quality heroin). . ."

164. On August 10, 2010, at approximately 8:41 p.m., LARRY NEAL called BRAULIO DIAZ on the telephone. DIAZ asked, "Have you seen your guy over there, have you talked to him, Ohio (ERNEST HARRIS)?" NEAL said, "Yeah, I talked to him today, he said he trying to send something (money) today or in a couple of day, he telling me, mainly he told me he don't want to be in debt, dude is telling me to come get it (poor quality heroin), but I don't want to go over there (Cleveland) . . ." DIAZ said, "Okay. We are going to take a little time with him and do something real quick over here so we can get some cash and go get that too. . . I'll call you tomorrow afternoon."

165. On August 11, 2010, at approximately 9:32 p.m., BRAULIO DIAZ called LARRY NEAL on the telephone. During the conversation, DIAZ said, "Yeah, but, um, like I talked to guys (DIAZ' heroin supplier(s)), uh, what about, what time you get up tomorrow?" NEAL said, "Whenever man." DIAZ said, "Okay, I give you a call soon as I get up then. . . Definitely something going to happen (DIAZ is getting a supply of heroin)."

166. On August 12, 2010, at approximately 12:27 p.m., RAYSHAWN LIGON called DIVAUGHN LIGON on the telephone. During the conversation, RAYSHAWN said, "But he, he, he (heroin customer) sending me that he came through his last line and he got a gramma (gram of heroin) from me, but he said he got a dude (customer) that wants, got three cents (\$300), so I told him I'm

going call you and shit because you're down in the hood and shit, so that was, you know what I'm saying?" DIVAUGHN said, "Aw." RAYSHAWN said, "But you know, you can probably take the two (grams of heroin) and put another gangster all in whacking (DIVAUGHN can take the two grams of heroin and put one gram of cut into it to make three grams and increase his profit)." DIVAUGHN replied, "Alright."

167. On August 12, 2010, at approximately 1:04 p.m., Frederick (an individual known to the Grand Jury) called LARRY NEAL on the telephone. During the conversation, NEAL said, "But like I told him too, I can sell it (heroin) to him the way I get it (without cutting it), but I need a dollar (\$100 per gram). How dude (NEAL's heroin supplier) give it to me, I'll sell it to him (NEAL's heroin customer) like that. I'll make \$20 'cuz they (NEAL's heroin suppliers) want 80 or 85 (dollars per gram). I'll make \$15, I ain't trippin' shit. Some money better than no money. If I can get them (heroin customers) to spend that dollar (\$100 per gram), I can make \$20 off each of them (gram of heroin), like we both said nigga. If you running through 25 (grams of heroin) of them every day nigga, that is 500 (\$500 profit). Fuck all that trying to put something on that shit (cutting the heroin), send that shit like it is, ask for your dollar (\$100 per gram)." Frederick said, "Yeah that's true."

168. On August 12, 2010, at approximately 2:46 p.m., LARRY NEAL called ERNEST HARRIS on the telephone. During the conversation, NEAL said, "Seeing if you had a couple dollar man (HARRIS owes NEAL money for previously supplied heroin)." HARRIS said, "I just set it down, I was trying so much shit, I was fucking it up, I just wrapped that shit up man (HARRIS could not sell the poor quality heroin). It was getting too crazy for me man, trying to make niggas (heroin customers) take it (poor quality heroin) and all kind of shit. I knew you was going to be calling so. . ." NEAL replied, "Right, right, right. Well, you know I ain't purposely putting no pressure on you, you know that. I just . . ." HARRIS interrupted, "I know man, no, no, I hear ya. You never did that. I ain't even thinking no shit like that . . . its all business man. . . I'm trying to make it happen."

169. On August 12, 2010, at approximately 6:18 p.m., JAMEL McHANEY called RAYSHAWN LIGON on the telephone. McHANEY said, "Hey, tomorrow I'll be atcha for them two (two ounces of heroin) alright? Poppin' it even, alright?" LIGON replied, "Okay. Alright, it's a bet."

170. On August 13, 2010, at approximately 9:44 a.m., BRAULIO DIAZ called LARRY NEAL on the telephone. NEAL said, ". . . Just letting you know I got the title and stuff for the vehicle (as drug debt payment to NEAL's heroin supplier)." DIAZ said, "Okay, my son is going to have my phone 'till twelve, I'll be

calling you at twelve, so you can meet this guy and give him the car so we can get started as soon as possible."

171. On August 13, 2010, at approximately 2:51 p.m., DONTJOYE KEVIN FEELINGS called LARRY NEAL on the telephone. During the conversation, NEAL said, "I was trying to let you know I was going to probably be there (Minnesota) tomorrow, cause I am waiting on this little guy (HARRIS) to send me that money from Cleveland, cause I been waiting on this money for the last three days man, he (HARRIS) say today definitely so." FEELINGS replied, "Okay, okay, okay." NEAL said, "He supposed to send me 500 (dollars), that's the only delay that I got." FEELINGS said, "Okay, well shit, I'm here (in Minnesota ready to sell heroin) so."

172. On August 13, 2010, at approximately 7:34 p.m., an Unknown Male (UM) called LARRY NEAL on the telephone. NEAL stated, "Slow motion man. He (ERNEST HARRIS) still saying the same thing man. This stuff (heroin) is weak man, that what he complaining. He (HARRIS) just telling me to come back and get it, he stressed out. I took the vehicle over there to Tiger (as payment for previously fronted heroin)." The UM asked, "Nobody call you, your friend?" NEAL said, "TONY (BRAULIO DIAZ) called me and I went and took the vehicle over there. I'm trying man, you know how it is when you don't have good material (high quality heroin) man. Everybody going to complain. He (TONY)

said he be down tonight or tomorrow so, we are going to some type of conclusion." The UM said, "Ok."

173. On August 14, 2010, at approximately 11:07 a.m., Jerry (an individual known to the Grand Jury) called LARRY NEAL on the telephone. NEAL stated, "Hey listen, man, I'm just trying to get a couple hundred dollars and we going to break out tomorrow (to Minnesota), dude (DONTOYE KEVIN FEELINGS) keep calling me up there. Yeah, I told him, he got them things you like (cocaine) man, you know what I'm saying, he asking how much they go for. I said I got a mother fucker that can push that shit (sell cocaine) for you, Bella know who it is. But he got to get it for at least 28 or 27 (\$28,000 per kilogram of cocaine). He can make miracles happen (sell large amounts of cocaine), and they have to be right (high quality cocaine). He got boat, you know what I'm saying. He want me to come up and talk and check it out (cocaine and heroin). We going to break out in the morning just to go talk to him. We spend a day or two up there. I'm suppose to get something (heroin) from the Amigos (NEAL's Mexican heroin suppliers) today, so I'm going to take like a little 25 (grams of heroin), put a couple dollars in our pocket." Jerry asked, "You are going to take something up there?" NEAL said, "Like 25, or nothing, what you think?" Jerry asked, "What, you got something new?" NEAL said, "I said I suppose to get something today." Later in the conversation, NEAL said, "But dude (FEELINGS) want

me to come check out my uncle Harry (supply of heroin), you know what I'm saying. He want to make sure it is what it is (high quality heroin). And he said he got that other material you like (cocaine)."

174. On August 14, 2010, at approximately 1:31 p.m., BRAULIO DIAZ called LARRY NEAL on the telephone. DIAZ said, "Hola, my guy said that when, they never send us nothin' (HARRIS did not wire transfer money)." NEAL said, "Yeah, I know, I know, I just tried to call him now. . . He said that ah, they, they, that they scent is weak (weak heroin) man, that's still a problem, like I told em yesterday. I had talked to him yesterday, your guy (DIAZ' heroin partner). . . I told em, I said I might need something strong (stronger heroin) man, I could, I could pay the bill off it (debt owed to DIAZ for previously fronted heroin), I need something strong. . . My guy last night, the one from 43rd (Street in Chicago), he called me last night, somebody wanted some (a heroin customer wanted heroin). . ." DIAZ said, "Ok, I got it . . . Ah, it should be there shortly." NEAL said, "If you could give us a little (heroin), just to do something while we're here. . . I want that one Tiger (DIAZ' heroin associate) was talkin' about." DIAZ said, "I already talked to him (Tiger) too today, but I'll be over there soon."

175. On August 14, 2010, at approximately 3:10 p.m., DONTOYE KEVIN FEELINGS called LARRY NEAL on the telephone. NEAL

asked, "Hey, ah, I just want to ask you man, you know, uh, our uncle man (heroin), uh what color is that stripper bitches (how is the quality of heroin), you know, uncle Henry (heroin)."

FEELINGS said, "It's looking greyish." NEAL said, "Okay, this is what I want to do right, cause, ah my cousin, he right there right, . . . I want you know, you can slide into him and um, let him check on them bitches (allow NEAL's cousin to check the quality of the heroin) out there, so you know a, a little piece."

About two minutes later, FEELINGS called NEAL and asked, ". . . What you think you need to see (how much heroin do you need to test)?" NEAL replied, ". . . just a little piece, like you know, like half a G (half a gram of heroin)."

176. On August 14, 2010, at approximately 6:47 p.m., TRAVON WILLIAMS called RAYSHAWN LIGON on the telephone. During the conversation, WILLIAMS said, "Man, get my two dollars (\$2,000 for previously fronted heroin) too nigga." LIGON asked, "Two dollars?" WILLIAMS replied, "Yeah nigga." LIGON said, "That was eleven (\$1,100) too." WILLIAMS said, "I counted it, no it wasn't." LIGON said, "Alright." They agreed to meet.

177. On August 15, 2010, at approximately 2:08 p.m., LARRY NEAL called James (an individual known to the Grand Jury) on the telephone. During the conversation, NEAL said, "I have to go and retrieve this shit (heroin), dude keep calling me man. And Bobo (drug associate) say that shit a winner (good quality heroin),

dude got two, three dollars (200 or 300 grams of heroin) for me. I have to go and negotiate the price and what he going to get back or whatever, he keep telling me man, come on man I got this shit (heroin) for man, I called you four days ago, I guess he right shit. Run up there, I'm waiting on ERN (ERNEST HARRIS) to send me this little 500 (\$500), I'm fittin' to run there (Minnesota) and run right back." James said, "Alright."

178. On August 15, 2010, at approximately 3:07 p.m., LARRY NEAL called ERNEST HARRIS on the telephone. During the conversation, NEAL asked, "That money gram?" HARRIS replied, "56944550 Emery Harris." NEAL asked, "Emis Harris?" HARRIS replied, "Emery, Emery, same old Emery." NEAL said, "Emery Harris, and what is the last name? It's time to visit (come to Cleveland). How much (money) is it?" HARRIS replied, "Two (an amount of money), I told you, I told you that." NEAL said, "It's cool, but you say that the first stuff (heroin) I gave you, they (heroin customers) like, that's what they like?" HARRIS replied, "Yea, . . . it's better you know."

179. On August 15, 2010, LARRY NEAL traveled from Chicago, Illinois, to Minneapolis, Minnesota, to obtain heroin from DONTOYE KEVIN FEELINGS. On August 15, 2010 at approximately 9:48 p.m., FEELINGS called NEAL on the telephone and asked, "I know I seen you, are you here yet?" NEAL replied, "Like 100 miles away."

180. On August 17, 2010, at approximately 10:37 a.m., JAMEL McHANEY called RAYSHAWN LIGON on the telephone. McHANEY asked, "What (how much heroin) you got left?" LIGON replied, "Ahh, shit, I got like 'bout three and a half (ounces of heroin) or something like that." McHANEY replied, "Alright then, I about to get about two (ounces of heroin) of them, alright?"

181. On August 17, 2010, at approximately 1:36 p.m., LARRY NEAL called DONTOYE KEVIN FEELINGS on the telephone. During the conversation, NEAL said, "Hey, um, I'm gonna be finishing with up (finish selling the heroin FEELINGS fronted to NEAL on August 15, 2010) probably today and no later than tomorrow what you had gave me. . . So how you want me to send that money?" FEELINGS replied, "Uh, I'll get back to you and let you know."

182. On August 17, 2010, at approximately 4:00 p.m., RAYSHAWN LIGON, while riding as a passenger in a vehicle driven by his father, JULIUS CARSON, JR. threw approximately four ounces of heroin out of the car window and into some bushes off the freeway ramp near I-90 and St. Clair Avenue in Cleveland, Ohio, because he thought he was being followed by police.

183. On August 17, 2010, at approximately 8:04 p.m., LARRY NEAL called ERNEST HARRIS on the telephone. NEAL said, "I'll be over there (Cleveland) this weekend man, with some thunder (high quality heroin)." HARRIS asked, "Okay, yeah, this weekend?" NEAL said, "Yeah, he (DONTOYE KEVIN FEELINGS) gave me, ah, he

just gave me a sample, you know what I'm sayin'? . . . I'll be there over the weekend, you'll have you some thunder." HARRIS replied, "Okay man, I'm going to a wedding . . . I don't want to fuck around and miss out man, fuckin around." Later, NEAL said, "From one to ten, it's an eight (quality)." HARRIS said, "Okay, that's good man. . . ."

184. On August 17, 2010, at approximately 11:34 p.m., LARRY NEAL called BRAULIO DIAZ on the telephone. NEAL said, "Yeah, bro, my man said that's nothing man, . . yeah, he shot it right in front of me man (NEAL had an addict test a sample of DIAZ' heroin)." DIAZ replied, "Okay." NEAL said, "He said he wouldn't mess with that (the quality of the heroin was poor)." DIAZ replied, "No problem."

185. On August 18, 2010, at approximately 11:12 a.m., RAYSHAWN LIGON called JULIUS CARSON, JR. on the telephone. LIGON said, "I need to find my shit (the heroin he threw out of the car) man, I need to find my shit man. I need, uh, SNOOP (LEONARD YOUNG) and Ant (a relative of LIGON's) or something around that mother fucker." CARSON asked, "Who Ant?" LIGON said, "SNOOP and Ant." CARSON said, "Oh, I saw SNOOP too." LIGON said, "He was watching their ass while they searched that mother fucker (LIGON wanted CARSON to watch YOUNG and Ant while they searched for his heroin he threw into the bushes so they wouldn't steal it)." CARSON said, "Hell yeah."

186. On August 18, 2010, at approximately 11:15 a.m., LEONARD YOUNG called RAYSHAWN LIGON on the telephone. LIGON said, "Alright, look, the people (law enforcement) that got behind me yesterday, I had to, on the freeway, I had to uh, get off at the ramp, uh, I had to uh, uh, toss my joint man, like four zips (four ounces of heroin) and shit. So I need you to uh, go and grab that shit for and shit. OG (JULIUS CARSON, JR.) know where the spot is. I need you to look for that shit right there, it's in the grass like, in the little grass, bushes there like off the freeway." YOUNG replied, "Okay, don't worry about it. You know I got you boy." LIGON said, "Alright, call OG (CARSON) he right by the car wash and shit. He know how to show you exactly where it's at . . ."

187. On August 18, 2010, at approximately 11:18 a.m., BRAULIO DIAZ called LARRY NEAL on the telephone. During the conversation, DIAZ said, "Yeah, but this guy is going to call me and then you go see him, Tiger, you want to see Tiger too?" NEAL asked, "Aw, he got something different (higher quality heroin)?" DIAZ said, "Yeah, because that (previously supplied heroin) was no Tiger, that was somebody else that I see at, where I work." NEAL said, "Yeah, don't mess with that bro, my man said he didn't feel nothing (when injected, NEAL's heroin customer did not get high). . . It's probably good for the regular way (snorting), you

know what I mean." DIAZ said, "We don't go (to Cleveland) 'til we get the right thing."

188. On August 18, 2010, at approximately 12:17 p.m., LEONARD YOUNG called RAYSHAWN LIGON on the telephone. YOUNG said, "I can't find that shit (heroin) for shit. I'm still over here searching. I went on the freeway and everything, couple of times." LIGON said, "That shit's gone, ain't it man?" YOUNG said, "Whoever you sent to get it man, they got that shit." LIGON replied, "That shit gone, huh, cuz?" YOUNG said, "That shit gone. I'd a been find it for sure nigger. I done been all in the bushes and all types of shit. I'm on the freeway still, I already searched this bitch about four or five times." LIGON stated, "Dang! Yo cause old man, I can't believe that shit. That shit was four zips (four ounces of heroin) man." YOUNG said, "Right, right, alright."

189. On August 18, 2010, at approximately 2:50 p.m., LARRY NEAL called RAYSHAWN LIGON on the telephone. NEAL said, "Dude and them got garbage (poor quality heroin), shit I can't fuck with them shit. Every sample (of heroin) I get from them niggas, its either plain or some bullshit." LIGON said, "Are you serious?" NEAL said, "I don't know what is going on with dude (BRAULIO DIAZ) and them. It ain't even him man, it's a bunch of them. I was calling you man, my cousin back from out of town, but he got some thunder man (high quality heroin). I can't be

playing any games, I have to make some money." LIGON said, "I got a play (customer) for two (ounces of heroin) right now." NEAL said, "You remember my cousin who came with me? It like this man, I'm going to keep it 100% with you. I ain't got time to sugar coat it. This guy sell it like it is (non-cut heroin) man and run with the little money. Mother fucker going to give it to you for the 65 (\$65 per gram) and it should be no way you can't sell it for 85 (\$85 per gram) and see two g's off each one (\$2,000 profit off each ounce). That way the people, they going to like it. We ain't got time to go into no kitchen playing with that shit (cutting the heroin), none of that. LIGON said, "Right, right, right. Listen me nigga, damn man, I need your ass, I need you to hit the highway, I need you to get up here on the asap-side (come to Cleveland with heroin)."

190. On August 18, 2010, at approximately 5:07 p.m., RAYSHAWN LIGON called DIVAUGHN LIGON on the telephone. During the conversation, RAYSHAWN asked, "What you got left? I gotta, I gotta a little note and shit (heroin sale). Man, he (customer) . . . he got five and a half (needs five and a half grams of heroin)." DIVAUGHN replied, "Huh?" RAYSHAWN replied, "He want five and a half." DIVAUGHN asked, "He want five and a half?" RAYSHAWN said, "Yeah." DIVAUGHN stated, "Alright . . ."

191. On August 19, 2010, at approximately 11:52 a.m., DONTJOYE KEVIN FEELINGS called LARRY NEAL on the telephone.

During the conversation, NEAL said, ". . . That's the reason I go up the other way, you know, where I told you about. . . Because I know it's definitely cash. Them niggas (heroin customers in Cleveland, Ohio) is dealing with cash up there, I ain't gotta be waiting around. . ." FEELINGS asked, "So that's what you would rather do?" NEAL said, "Yeah man, I would rather, once I cash you out (pay FEELINGS for previously fronted heroin), and I get to that (another supply of heroin), see I don't want to go to Cleveland with no little shit (small amount of heroin), you know what I'm saying?" FEELINGS said, "Yeah, we'll see. That's why I'm trying to call and see what you wanna do, before I figure out what I was going to do . . ." NEAL said, ". . . I want to do it the same way, I rather come there (Minnesota) and do from you, you know what I'm saying, for the time being until we, 'til I get back. . ." Later FEELINGS asked, ". . . But you got half of it (money) right?" NEAL asked, "The money?" FEELINGS said, "Yeah." NEAL said, "Well, he (heroin customer) said he got half, I'm just waiting on him. . ."

192. On August 19, 2010, at approximately 9:33 p.m., JASON MORGAN called RAYSHAWN LIGON on the telephone. During the conversation, LIGON stated, "My nigga from the Chi (Chicago) L (LARRY NEAL) and Jo-Jo (another drug supplier from Belize) gonna be here Saturday so we about to be good." MORGAN replied, "I got

like a half (an amount of heroin) and I'm gonna turn that into a mountain (by adding cut)."

193. On August 20, 2010, at approximately 5:55 p.m., RAYSHAWN LIGON called IVAN HARRIS on the telephone. During the conversation, LIGON said, "I got a couple niggas (heroin customers) callin' me and shit, but man they be wantin' that thunder (high quality heroin) man." HARRIS asked, "Where you at?" LIGON replied, "Oh, right now, I'm, ah, for real, actually, I'm taking, ah, this picture (sample of heroin) over to this dude (customer) now and shit, he already know he might turn this down (refuse to accept poor quality heroin) man." HARRIS replied, "I'll call and I'll come back down, I'll leave in like a half an hour." LIGON said, "Alright."

194. On August 20, 2010, at approximately 6:44 p.m., JULIUS CARSON, JR. called RAYSHAWN LIGON on the telephone. CARSON asked, 'You ain't around LOU (DIVAUGHN LIGON)?" LIGON replied, "Na ah (negative)." CARSON said, "Oh, ok, I know BOOTY (JASON MORGAN) just called me for a uh, you know for a shiz out (an amount of heroin). I was just making sure he want me to do?" LIGON asked, "Oh, he called for who?" CARSON stated, "For a shiz out (an amount of heroin)." LIGON replied, "Oh."

195. On August 20, 2010, at approximately 7:22 p.m., DONTJOYE KEVIN FEELINGS called LARRY NEAL on the telephone. NEAL asked, "Yeah, um, I'm in my town (Chicago) man, you know what I'm

saying. Um, when I get this money, what you want me to send it to Western Union or something?" FEELINGS replied, "Yeah, I'ma have you do a couple different things with it, do half and half with it (to avoid arousing law enforcement suspicion and reporting requirements)." NEAL said, "Okay, alright."

196. On August 21, 2010, at approximately 1:08 p.m., RAYSHAWN LIGON called LARRY NEAL on the telephone. NEAL said, "Later today, go get them samples (of heroin) see what's going on, it's thunder (high quality heroin), but you know how it is, they give you the sample thunder and then they turn around . . . You'll be seeing me soon. It must not be nothing there again (no heroin in Cleveland for LIGON to purchase)." LIGON said, "Hell yeah. We got some decent shit, some nice fire (high quality heroin), man like you say if it like that, how you just told me." NEAL said, "On a scale from 1 to 10, it's an 8." LIGON said, "We can roll." Later in the conversation, LIGON said, "I'm just waiting on that one mother fuckin' run, where that thing turn all the way back around, were a nigga get hold of 50, 60 thousand again (purchase \$60,000 worth of heroin)." Later in the conversation, LIGON said, "I had a good-ass thing going with that nigga (LIGON's alternate heroin supplier in Chicago, Illinois) man, talking about the shit this nigga had man, I was doing numbers like 24 grand today (sell \$24,000 worth of heroin), might do another 14 (\$14,000 heroin sales), 16 grand tomorrow, do

another 20 grand the next day. I talking this nigga had everybody coming to see me (to purchase heroin). I'm talking it was dumb shit going on. I had some stupid-ass plays (high volume heroin sales). Those niggas want that flame (high quality heroin)." NEAL said, "I'm on it, I'll be there man (to supply LIGON heroin)."

197. On August 21, 2010, at approximately 5:22 p.m., RAYSHAWN LIGON called IVAN HARRIS on the telephone. LIGON said, "Shit, hey, this dude (heroin customer) he gone to call me like nine (wants to purchase heroin)." HARRIS said, "Call me." LIGON said, "Alright."

198. On August 23, 2010, at approximately 3:42 p.m., RAYSHAWN LIGON called LARRY NEAL on the telephone. NEAL said, "Yeah, I should be there in a couple of days or something, I'm working on it. We got some thunder (high quality heroin) though." LIGON said, "Oh yeah, we can eat." NEAL said, "I know the first (of the month) coming up brother. I know." LIGON said, "Hell yeah, we can definitely eat. Keep me posted, let me know." NEAL said, "Alright."

199. On August 24, 2010, at approximately 1:41 p.m., LARRY NEAL called BRAULIO DIAZ on the telephone. During the conversation, NEAL said, "I got some of that stuff, I got some of that stuff you like (cocaine)." DIAZ said, "Okay, perfect." NEAL said, "That's uh, you know the white (cocaine) boy." DIAZ

replied, "Maybe you could give me a little bit, not too much, maybe a ball (3.5 grams) or something." NEAL replied, "Yeah, that ain't no problem bro, whatever you want man. You know I got no problem giving you nothing man."

200. On August 25, 2010, at approximately 7:09 p.m., RAYSHAWN LIGON called DARNELL HAYNES on the telephone. LIGON asked, "Um, shit, your peoples got somethin' on your side (cocaine)? . . . Oh, I'm tryin' to get Marco (cocaine customer) something together real quick. . ." HAYNES asked, "What he want though?" LIGON replied, "Call him, you know he probably, I don't know, probably a nine (nine ounces of cocaine) or some shit or half (half a kilogram of cocaine), I don't know." HAYNES said, "See what he wants. I can get him some shit. I can definitely get him some shit."

201. On August 26, 2010, at approximately 3:57 p.m., BRAULIO DIAZ called LARRY NEAL on the telephone. DIAZ asked, "Hey, uh, white boy (cocaine) still with you or no?" NEAL replied, ". . Yeah, I still got some white boy." DIAZ said, "Alright, is there any way you could drop off, um, to my guy (cocaine customer), like a half onion (half ounce of cocaine)?" NEAL replied, "Yes sir, they got a scale?" DIAZ replied, "Uh, he should." Later in the conversation, DIAZ asked, "How much it gonna be for a bill?" NEAL asked, "For what, an onion (an ounce of cocaine)?" DIAZ said, Uh huh (affirmative). NEAL said,

"I'll give it to you for 9 (\$900) right now." DIAZ said,
"Perfect."

202. On or about August 27, 2010, DONTOYE KEVIN FEELINGS caused a package containing approximately 323 grams of heroin to be mailed from California to LARRY NEAL in Chicago, Illinois.

203. On August 27, 2010, at approximately 1:31 p.m., ERNEST HARRIS called LARRY NEAL on the telephone. NEAL said, "Yep, I should be there (Cleveland) tomorrow man." HARRIS said, "Oh, I thought you said Thursday, Friday?" NEAL replied, "Nah, I mean my man (BRAULIO DIAZ), I'm getting it this evening, when he get off work and then I be up there. But it's some thunder (high quality heroin) though. He gave me a sample last night. I meant to call you last night. . . On a scale of from one to ten, it's an eight. I'll definitely be there, don't worry." HARRIS replied, "Alright."

204. On August 27, 2010, at approximately 7:30 p.m., RAYSHAWN LIGON called IVAN HARRIS on the telephone. LIGON said, "I need like one and a half (grams of heroin) real quick for these people (customers)." HARRIS replied, 'Ah, I'm not sure if I can do it." LIGON replied, "Not, no, no, no, I'm talkin about, ah, small one (grams not ounces)." HARRIS replied, "Ah, alright."

205. On August 28, 2010, at approximately 4:31 p.m., DONTOYE KEVIN FEELINGS called LARRY NEAL on the telephone. NEAL

said, "She (NEAL's wife) said they (mailman) came by earlier and said, uh, that they, uh, had a package (the package containing the 323 grams of heroin that FEELINGS had previously mailed to NEAL) there, but it was still in the office, but he had to go back and get it once he finished with his route. He was gonna bring it back or whatever." FEELINGS said, "Oh?" NEAL said, "That was the only thing that she said and then, um, she just called and told me dude came back with some mail, and uh, some certified mail, but he didn't bring no package." FEELINGS asked, "Hold on, he said he didn't bring a package?" NEAL said, "Nah, he brought some certified mail." FEELINGS said, "Mother fucker did the tracking on it, mother fucker said it was en route earlier."

206. On August 30, 2010, at approximately 12:23 p.m., RAYSHAWN LIGON called IVAN HARRIS on the telephone. During the conversation, LIGON said, "Like five (grams of heroin) man." HARRIS replied, "I'm about to call you in five minutes, see where you at." LIGON said, "Alright."

207. On August 31, 2010, at approximately 6:49 p.m., RAYSHAWN LIGON called IVAN HARRIS on the telephone. During the conversation, LIGON said, "My brother (DIVAUGHN LIGON) want like five (grams of heroin), he'd like five. . ." HARRIS replied, "Okay." LIGON said, "Alright."

208. On September 1, 2010, at approximately 6:57 p.m., RAYSHAWN LIGON called NIAKENA K. HEARD on the telephone. LIGON asked, "Where you at boy?" HEARD asked, "Who this?" LIGON replied, "D-Ray boy." HEARD said, "Oh, I'm heading back down, . . . I had ran around the corner real quick." LIGON said, "Yeah, yeah, yeah, come on man, cause ah, ah, Vick man (Seven - the football jersey number of NFL quarterback Michael Vick - meaning seven grams of heroin) . . . I gotta put a Vick (seven grams of heroin) with it." HEARD replied, "Aight."

209. On September 7, 2010, LARRY NEAL met DIVAUGHN LIGON and JULIUS CARSON, JR. in Cleveland, Ohio, and provided them with 100 grams of heroin.

210. On September 9, 2010, DIVAUGHN LIGON met LARRY NEAL in Cleveland, Ohio, and paid NEAL \$3,500 for previously fronted heroin.

211. On September 9, 2010, ERNEST HARRIS paid LARRY NEAL \$2,000.00 for previously fronted heroin.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges:

Beginning at least as early as November 2009, and continuing through September 10, 2010, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Eastern Division, and

elsewhere, RAYSHAWN LIGON, aka DIRTY RAY; TEKORA MADDEN, aka TK; RICARDO BRASHERS, aka RICO; PERRY AVERY, JR., the defendants herein, and others known and unknown, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute at least 50 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

A. It was part of the conspiracy that RAYSHAWN LIGON obtained amounts of regular and high-grade marijuana from an Unknown Male, aka Moe, residing in California, and also from RICARDO BRASHERS, TEKORA MADDEN and others known and unknown in the Cleveland, Ohio area.

B. It was further part of the conspiracy that RAYSHAWN LIGON purchased marijuana himself for re-sale or brokered marijuana deals between the various marijuana suppliers and LIGON's customers throughout the greater Cleveland, Ohio area.

C. It was further part of the conspiracy that RAYSHAWN LIGON, an Unknown Male, aka Moe, and others used the mail to ship marijuana across the country and used various wire services like

Western Union to wire money to pay for marijuana and to avoid detection by law enforcement.

OVERT ACTS

In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, the defendants and others performed overt acts including but not limited to the following:

1. On June 12, 2010, at approximately 5:36 p.m., RAYSHAWN LIGON called an Unknown Male, aka Moe, on the telephone. During the conversation, Moe and LIGON discussed trying to find the cheapest airline tickets for LIGON to fly to California to meet Moe to purchase marijuana. LIGON stated, "I need to get out of here to Cali (California) hollar at my people (drug supplier) man but they talking about a rack (\$1,000 for a airline ticket), I'm like damn. . ." Later in the conversation, LIGON stated, "I'm going to check out them three (airline flights) today and hopefully I come up, if I come up, I'll shoot straight out of here man tomorrow (fly to California). I'll shoot tomorrow for real." Moe said, "Ok, let me know what the business and then we will put it together from here." LIGON stated, "Yeah, cause, I man already lined up all the ducks (drug customers). The real ducks. They ready. I'm talking about my one Jamaican dude, he like, he talking just on the mid-side (lower quality marijuana) though. He like man, I do two hundred a week (sells 200 pounds of marijuana a week). He like man, you get them in, I'll cash. . .

." Moe stated, "All that shit and my cat (drug supplier) hit me and said he good the boy on deck too, you feel me? (Moe's drug supplier has large quantities of drugs to sell)?" LIGON stated, "Oh, we gonna make millions."

2. On June 14, 2010, at approximately 1:22 p.m., an Unknown Male, aka Moe, called RAYSHAWN LIGON on the telephone. LIGON stated, "Just got all of my people booking for that flight tomorrow too (LIGON is trying to book a flight to California to visit his drug supplier)." Moe stated, "I was calling you to run something by you. I was like, I know how this whole little trip kinda a headache to put this shit together, I didn't know if you just want to throw like half (money for half a pound of marijuana) you know what I mean on the shit, motherfucker throw you a little half of thing (half pound of marijuana in the mail), you feel me, so a nigga get it rocking around while a motherfucker gone. You feel me? Save a nigga some cheese (on airline tickets) and all that shit, so a nigga can really get something in progress, shit we been playing phone tag for damn near a month now you know what I'm talking about?" LIGON said, "We need to get shit going, I wanted to work that granddaddy (high grade marijuana)." Moe said, "Oh, you wanted that granddaddy (marijuana)?" LIGON asked, "Like what is the normal on that thing? (price for a pound of high grade marijuana)" Moe stated, "48 for the whole boy (\$4,800 for a pound of marijuana),

we can probably do a half boy (half pound), nigga (Moe's marijuana supplier) be wanting 26 (\$2,600 per half pound), we'll do that half boy, I'll squeeze him out for 24 (\$2,400), we'll get that shit rockin' man on the first one. We will do it straight up (cash up front), . . ."

3. On June 17, 2010, at approximately 1:05 p.m., PERRY AVERY, JR. called RAYSHAWN LIGON on the telephone. During the conversation, LIGON stated, "I linked up, I had sent the nigga (Moe, the California marijuana supplier) the bread (money), I sent the nigga 2,400 (dollars) yesterday. . . Overnight, I'm trying to call that nigga to make sure he done sent that shit (supply of marijuana)." Avery said, "Oh yeah, let me, let me get this number right mother fucking now then (Moe's telephone number)." LIGON said, "Hell yeah, . . . I'm supposed to get, I gotta get him the address (where to mail the shipment of marijuana)." Avery asked, "What you gonna get the um, tree (marijuana)?" LIGON said, "Yeah, on the ushy side (high quality marijuana). . . It's only gonna be, you know what I'm say, a single shot (pound of high grade marijuana). He said you know man that's just that nigga (Moe's supplier) trying to feeling me out for real. . . He like, man we gonna do it like this, get half of the bread (money), then I'm gonna. . ." Avery said, "Then I'm gonna start pushing (supplying higher quantities of marijuana), right, right, right."

4. On June 21, 2010, at approximately 7:48 p.m., PERRY AVERY, JR. called RAYSHAWN LIGON on the telephone. Avery stated, "I gotta get that mother fucker's number (Moe's telephone number) from you and shit man, like I probably. . . gonna um, probably have him put that shit (supply of drugs for Avery) with your's (marijuana) though. That's cool? . . . I'm probably gonna have him blast (ship) that demo (sample) off with your's (supply of marijuana) though, that's cool?" LIGON asked, "Oh yeah. What he 'posed to sell, what?" Avery said, "For dude (customer) and shit." LIGON said, "Oh, for Bleed huh, oh okay, okay, oh, you want the number?" Avery said, "Yeah, my man (drug customer) he just called me and told me to call you and get the number and shit." LIGON said, "You ready for it? . . . 702-604-1205." Avery said, ". . . I got some niggas (customers) lined up over there on Cliffview (Avenue) man with, you know what I mean. . . As soon as your shit drop (supply of marijuana from California), you feel me? . . . I mean what are we talking about (when will the shipment arrive in Cleveland)?" LIGON said, "He said by Thursday. . ." Later in the conversation, Avery asked, "What we going to uhh, them bitches go for 500 (\$500 per ounce for high grade marijuana)?" LIGON said, "No we ain't going to hit them (customers) upside the head like that, I mean you want you know you can catch some suckers, I am going to let them go for 450

(\$450 per ounce of marijuana) though." AVERY said, "450, oh yeah. I got at least 475, I catch a nigga like that."

5. On or about June 25, 2010, the Unknown Male, aka Moe, in California shipped approximately 300 grams of high grade marijuana to RAYSHAWN LIGON at 25111 Lakeshore, Apartment A18, Euclid, Ohio.

6. On June 26, 2010, at approximately 10:30 a.m., RAYSHAWN LIGON called Jessica (a person known to the Grand Jury) on the telephone. LIGON asked, "It came (package of marijuana from California)?" Jessica said, "No it didn't come, not yet." LIGON said, "It should be coming in a few minutes."

7. On June 26, 2010, at approximately 10:39 a.m., RAYSHAWN LIGON called Jessica (a person known to the Grand Jury) on the telephone. Jessica said, "Nothing, nothing came yet." LIGON asked, "Where you at?" Jessica said, ". . . I just came outside because it was hot in the house, I thought I heard something, nothing has came (package of marijuana from California)." LIGON asked, "Tell me your address again? What is the address again?" Jessica said, "25111 Lakeshore, Apartment A18, Euclid, Ohio (the address where LIGON had package of marijuana shipped to)." LIGON said, "Let me see what is going on man."

8. On July 13, 2010, at approximately 2:43 p.m., an Unknown Male, aka Moe, called RAYSHAWN LIGON on the telephone. Moe said, "Trying to put this shit (mail shipment of marijuana) together,

hit the highway as soon as I get this shit straight. . ." LIGON stated, "I got it right here, 10521 Lee Avenue, Cleveland, Ohio 44106, apartment number 8 (another address to ship the marijuana to)." Moe asked, "Anything I got to put on that?" LIGON said, "You can put any name, it's only one person staying there." Moe said, "I will hit you back in a minute with all the info."

9. On July 19, 2010, at approximately 12:49 p.m., RAYSHAWN LIGON called an Unknown Male, aka Moe, on the telephone. LIGON stated, "I was trying to put that move down on that shit. Hell yeah, on that polo cologne shit (high quality marijuana). My dude (customer), he said he'll cash us out or whatever on them boots (marijuana), but he say he need the stronger version though, the O.G. . . They say that the purple timberland (purple cush marijuana) is cool (good quality) but they like them O.G. timberlands (higher quality marijuana)." Moe asked, "You want the all green ones?" LIGON said, "Yeah, the real loud, very loud shit like when you break the thing down that shit be stANKING all on your fingers type shit (high quality marijuana)." Later in the conversation, Moe stated, "Let me get outta here man and holla at my dude (Moe's marijuana supplier) real quick. That shit gonna have to be like sixty two fifty (\$6,250 per pound)." Later in the conversation, LIGON said, "Alright, so we can go on ahead and grab the half (purchase a half pound of marijuana)."

10. On July 18, 2010, at approximately 9:09 p.m., RAYSHAWN LIGON called RICARDO BRASHERS on the telephone. During the conversation, LIGON said, ". . . I had came across something that you'll probably want to check out and grab some of it (marijuana). It only about eight though (8 out of 10 quality)." BRASHERS asked, "Oh, reggie (marijuana)?" LIGON said, "Yeah, on the medium side (quality), it's a nice little decent look too." BRASHERS said, ". . . What number you on (what's the price)?" LIGON replied, "It's at 850 (\$850 per pound)." BRASHERS said, "Yeah, you need to save them for me. . ."

11. On July 19, 2010, at approximately 7:52 p.m., RAYSHAWN LIGON called TEKORA MADDEN on the telephone. LIGON asked, "Alright, un line everything up and shit (get ready to sell marijuana). I'm about, he's (marijuana customer) out there with his son and shit, but as soon as he leaves there, he's going to link up with me and shit. What the, what, what number you can go for eight (pounds of marijuana)?" MADDEN said, "No." LIGON replied, "Alright, I'm going to, I'm gotta call you in a minute and line it up." MADDEN said, "Alright."

12. On July 20, 2010, at approximately 3:45 p.m., RAYSHAWN LIGON called TEKORA MADDEN on the telephone. LIGON said, "This dude (marijuana customer) just called me for them joints (pounds of marijuana). He on his way to me, so if you wanna bring them to me?" MADDEN replied, "Alright."

13. On July 20, 2010, at approximately 7:45 p.m., RAYSHAWN LIGON called RICARDO BRASHERS on the telephone. During the conversation, LIGON said, "She (TEKORA MADDEN) said okay, she going back to the people (MADDEN's marijuana suppliers), ahh, she said she got like 15 (pounds of marijuana) for you." BRASHERS asked, "You ain't seen none of this?" LIGON replied, "I seen the first batch, I imagine it's the same thing, but it ain't like as good as this, it cool like it ain't compressed, not that grain." BRASHERS asked, "and you said 850 (\$850 per pound)?" LIGON replied, "Yep." BRASHERS said, "I ain't got no change (money) on me. I need to see it though and you know."

14. On July 23, 2010, at approximately 7:07 p.m., TEKORA MADDEN called RAYSHAWN LIGON on the telephone. LIGON said, ". . . I meant to call your ass back too, dude (marijuana customer) said the people that he sent it to, he said it's kinda hard (poor quality), they really don't want to work with it." MADDEN replied, "I wish you would have been called me, I had some people (other marijuana customers) to call me and I told them no." LIGON said, "Yep, I should have been called. I got this, I got this, I'm waiting on this other little nigga (another marijuana customer) too though. This little nigga name nine-one, he wanted to grab a couple (pounds of marijuana). . ."

15. On July 27, 2010, at approximately 12:29 p.m., RAYSHAWN LIGON called TEKORA MADDEN on the telephone. LIGON stated, "I

got a dude he want like five of those things (five pounds of marijuana)." MADDEN said, "Oh, I'm on my way." LIGON said, "Alright, call me, I'm in the hood."

16. On July 28, 2010, at approximately 5:25 p.m., TEKORA MADDEN called RAYSHAWN LIGON on the telephone. MADDEN said, "You don't need your cash now, that was what I was telling you yesterday." LIGON said, "That would be perfect, I definitely got all these niggas (marijuana customers) keep calling." MADDEN said, "He thought I was talking my other people (other marijuana suppliers), I done co-signed (got the marijuana on credit from different suppliers)." LIGON said, "We will line up everything (get marijuana customers lined up) then, that would be perfect. I can make some calls on my end, they want to make sure it can move." MADDEN said, "I could have done something, so you could have seen. . ." LIGON replied, "Go ahead and line that up so I can, I'm going to line up dudes (marijuana customers) and get them a picture (sample) of that. . ."

17. On July 29, 2010, at approximately 11:46 a.m., TEKORA MADDEN called RAYSHAWN LIGON on the telephone. LIGON said, "Bring that picture (sample) of that thang (marijuana) you got too, you might as well just bring me one of em (pound of marijuana) so could, just, uh, you know what I'm saying." MADDEN replied, "Right." Approximately six and a half hours later, LIGON called MADDEN back and said, ". . . Oh, my buddy he in Cali

(California), but, um, I think the one dude (marijuana customer) is gonna back and get this one (pound of marijuana) right here . . . He'll grab the rest." MADDEN said, "Ok." LIGON said, ". . . Yeah, they said the same thing with this time like seven, seven and half, eight (quality)." MADDEN said, "So what you want me to do? Well, I'll talk to you when I get over there, you tell me what to do." LIGON said, "Alright."

18. On July 29, 2010, at approximately 9:18 p.m., TEKORA MADDEN called RAYSHAWN LIGON on the telephone. LIGON asked, ". . . What happened?" MADDEN said, "He (marijuana supplier) supposed to bring them three (pounds of marijuana) to you." LIGON asked, "He supposed to bring the three to me?" MADDEN said, "Yeah."

19. On August 1, 2010, at approximately 5:33 p.m., RAYSHAWN LIGON called TEKORA MADDEN on the telephone. LIGON said, "I got another dude (marijuana customer), he don't want the whole one (pound), he want just want half of one (half a pound of marijuana), but still just bring the shit." MADDEN said, "Oh, okay, cause that's what I have left too."

20. On August 3, 2010, at approximately 2:09 p.m., RAYSHAWN LIGON called TEKORA MADDEN on the telephone. LIGON asked, "What the dude talking about? You, I got a dude just called me for ten (pounds of marijuana) of those things so." MADDEN said, "We are going to quit talking (on the phone regarding drug business)

now." LIGON said, "I have to go get another phone, call me, I'm in the hood."

21. On August 3, 2010, at approximately 10:25 p.m., TEKORA MADDEN called RAYSHAWN LIGON on the telephone. MADDEN asked, "Alright, so what you want me to tell them (MADDEN's marijuana supplier)?" LIGON said, ". . . That shit, dude (LIGON's marijuana customer) don't want to work with that shit (purchase poor quality marijuana), shit, just tell him (MADDEN's marijuana supplier) we going to get together in the afternoon tomorrow. . . Just tell him I'll be ready in the afternoon tomorrow." MADDEN said, "Alright, . . . but you know how they be saying, whatever the picture (sample of marijuana) was, is what is was." LIGON said, "Right, I know, I know. . ."

22. On August 29, 2010, at approximately 4:57 p.m., RICARDO BRASHERS called RAYSHAWN LIGON on the telephone. LIGON said, "This, he (marijuana customer) wanted some little shit (marijuana)." BRASHERS asked, "Oh, what (how much marijuana) you was looking for?" LIGON replied, "Just like a, uh, half a joint (half a pound of marijuana)." BRASHERS said, "Oh, okay. . . I got some cush (high quality marijuana), you might want one (a pound) of them." LIGON said, "Oh yeah, I definitely need one of them." BRASHERS said, "I'll call you about seven o'clock, I'll have it ready."

23. On August 30, 2010, at approximately 9:59 p.m., RICARDO BRASHERS called RAYSHAWN LIGON on the telephone. LIGON said, ". . . I got two (LIGON needs two pounds of marijuana) I could do a little homework on, far as the bets and they (LIGON's marijuana customers) said there's some lower numbers (cheaper marijuana) around right now on that." BRASHERS said, "Yeah, I mean probably do 250 (take off \$250 per pound), that probably it you know. . . I can probably take 250 off that but that's probably it." LIGON asked, "Alright, so 6250 (\$6,250 per pound of high grade marijuana)?" BRASHERS said, "Yeah." LIGON replied, "Alright."

24. On August 31, 2010, at approximately 7:51 p.m., RAYSHAWN LIGON called RICARDO BRASHERS on the telephone. LIGON said, "Yeah, I'm um, I got a guy (marijuana customer) he in route to me and shit, so I need to link up with you on grabbing another one of those piss joints (pound of marijuana)." BRASHERS said, "Oh shit, them bitches might be gone. . . I'm a check right now, give me a minute."

25. On September 2, 2010, at approximately 8:14 p.m., RICARDO BRASHERS called RAYSHAWN LIGON on the telephone. BRASHERS asked, "Did you want them new reggies (regular quality marijuana)?" LIGON replied, "Yeah, I'm definitely 'bout to get them and shit." Approximately eleven minutes later, BRASHERS called LIGON back and said, "I said you might want to catch me tonight, cause I had grabbed it (the marijuana) you know." LIGON

asked, "Oh, you ended up grabbing one (pound of marijuana) ."

BRASHERS replied, "The regular (regular quality) ."

All in violation of Title 21, United States Code, Section 846.

COUNT 3

The Grand Jury further charges:

On or about February 3, 2010, in the Northern District of Ohio, Eastern Division, RAYSHAWN LIGON, aka DIRTY RAY, did knowingly and intentionally distribute approximately 20 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) .

COUNT 4

The Grand Jury further charges:

On or about April 16, 2010, in the Northern District of Ohio, Eastern Division, RAYSHAWN LIGON, aka DIRTY RAY, did knowingly and intentionally distribute approximately 28.5 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) .

COUNT 5

The Grand Jury further charges:

On or about April 29, 2010, in the Northern District of Ohio, Eastern Division, RAYSHAWN LIGON, aka DIRTY RAY, did

knowingly and intentionally distribute approximately 23.9 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 6

The Grand Jury further charges:

On or about May 25, 2010, in the Northern District of Ohio, Eastern Division, RAYSHAWN LIGON, aka DIRTY RAY, did knowingly and intentionally distribute approximately 28 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7

The Grand Jury further charges:

On or about July 7, 2010, in the Northern District of Ohio, Eastern Division, RAYSHAWN LIGON, aka DIRTY RAY, did knowingly and intentionally distribute approximately 57.8 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8

The Grand Jury further charges:

On or about July 31, 2010, in the Northern District of Ohio, Eastern Division, DIVAUGHN LIGON, aka LOU, having been previously

convicted of crimes punishable by imprisonment for a term exceeding one year, those are: (1) Carrying a Concealed Weapon (ORC § 2923.12), case number CR460801, in the Cuyahoga County Court of Common Pleas, on or about June 29, 2005; (2) Drug Possession (ORC §2925.11), case number CR473457, in the Cuyahoga County Court of Common Pleas, on or about July 14, 2006; and (3) Drug Possession (ORC §2925.11), case number CR533508, in the Cuyahoga County Court of Common Pleas, on or about March 29, 2010, did knowingly possess in and affecting commerce, a Colt MKIV .45 caliber pistol, series 80, serial number FR14957E, which firearm had been shipped and transported in interstate and/or foreign commerce.

All in violation of Title 18, Sections 922(g)(1) and 924, United States Code.

COUNT 9

The Grand Jury further charges:

On or about August 17, 2010, in the Northern District of Ohio, Eastern Division, RAYSHAWN LIGON, aka DIRTY RAY, did knowingly and intentionally possess with the intent to distribute approximately 83 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b) (1) (C) .

COUNT 10

The Grand Jury further charges:

Beginning at least as early as June 2010, and continuing through September 10, 2010, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Eastern Division, and elsewhere, RAYSHAWN LIGON, aka DIRTY RAY, and VERONICA JORDAN, the defendants herein, and others, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to knowingly and willfully conduct and attempt to conduct a series of financial transactions affecting interstate commerce which in fact involved the proceeds from a specified unlawful activity as defined in Title 18, Section 1956(c)(7), United States Code, to wit: conspiracy to knowingly and intentionally distribute and possess with the intent to distribute heroin, cocaine and marijuana, Schedule I and Schedule II controlled substances, a felony under Title 21, Section 846, United States Code, knowing that the transactions involved the proceeds of some form of unlawful activity, and:

- a. with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, Section 1956(a)(1)(A)(i), United States Code; and
- b. knowing that the transactions were designed in whole and in part to conceal the nature, location, source, ownership and

control of the proceeds of the said specified unlawful activity, in violation of Title 18, Section 1956(a)(1)(B)(i), United States Code.

MANNER AND MEANS

It was part of the conspiracy that VERONICA JORDAN provided advice and assistance to RAYSHAWN LIGON concerning methods to invest, launder and secret from authorities monies generated by the sale of heroin, cocaine and marijuana.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 11-106

The Grand Jury further charges:

On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 846:

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|--|---------------|-------------|
| 11 | RAYSHAWN LIGON, aka DIRTY RAY, JULIUS CARSON, JR., aka OG | June 10, 2010 | 11:28 a.m. |
| 12 | RAYSHAWN LIGON, aka DIRTY RAY, VAN HERRON | June 10, 2010 | 1:44 p.m. |
| 13 | RAYSHAWN LIGON, aka DIRTY RAY, VAN HERRON | June 10, 2010 | 3:30 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|--|---------------|-------------|
| 14 | RAYSHAWN LIGON, aka DIRTY RAY, PERRY AVERY, JR. | June 11, 2010 | 2:21 p.m. |
| 15 | RAYSHAWN LIGON, aka DIRTY RAY, JASON MORGAN, aka BOOTY | June 11, 2010 | 3:17 p.m. |
| 16 | RAYSHAWN LIGON, aka DIRTY RAY, JULIUS CARSON, JR., aka OG | June 11, 2010 | 6:34 p.m. |
| 17 | RAYSHAWN LIGON, aka DIRTY RAY, RUBY SEAGRAVES | June 13, 2010 | 2:32 p.m. |
| 18 | RAYSHAWN LIGON, aka DIRTY RAY, VAN HERRON | June 13, 2010 | 3:03 p.m. |
| 19 | RAYSHAWN LIGON, aka DIRTY RAY, WILLIAM EFFORD | June 13, 2010 | 5:10 p.m. |
| 20 | RAYSHAWN LIGON, aka DIRTY RAY, DIVAUGHN LIGON, aka LOU | June 14, 2010 | 3:28 p.m. |
| 21 | RAYSHAWN LIGON, aka DIRTY RAY, SHERTARRA CATRON, aka TT | June 14, 2010 | 5:45 p.m. |
| 22 | RAYSHAWN LIGON, aka DIRTY RAY, LEONARD COLE, aka SCOOTER | June 14, 2010 | 6:10 p.m. |
| 23 | RAYSHAWN LIGON, aka DIRTY RAY, JAMES HENRY, aka HURK | June 14, 2010 | 11:03 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|---|---------------|-------------|
| 24 | RAYSHAWN LIGON, aka DIRTY RAY, JASON MORGAN, aka BOOTY | June 15, 2010 | 1:50 p.m. |
| 25 | RAYSHAWN LIGON, aka DIRTY RAY, PERRY AVERY, JR. | June 17, 2010 | 1:05 p.m. |
| 26 | RAYSHAWN LIGON, aka DIRTY RAY, RUBY SEAGRAVES | June 19, 2010 | 2:26 p.m. |
| 27 | RAYSHAWN LIGON, aka DIRTY RAY, MICHAEL FASON, aka PT | June 21, 2010 | 12:46 a.m. |
| 28 | RAYSHAWN LIGON, aka DIRTY RAY, WILLIAM EFFORD | June 21, 2010 | 4:31 p.m. |
| 29 | RAYSHAWN LIGON, aka DIRTY RAY, LEONARD COLE, aka SCOOTER | June 21, 2010 | 5:33 p.m. |
| 30 | RAYSHAWN LIGON, aka DIRTY RAY, MICHAEL FASON, aka PT | June 22, 2010 | 3:51 p.m. |
| 31 | RAYSHAWN LIGON, aka DIRTY RAY, JAMES HENRY, aka HURK | June 22, 2010 | 8:59 p.m. |
| 32 | RAYSHAWN LIGON, aka DIRTY RAY, JAMES HENRY, aka HURK | June 24, 2010 | 4:17 p.m. |
| 33 | RAYSHAWN LIGON, aka DIRTY RAY, MICHAEL FASON, aka PT | June 26, 2010 | 4:25 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|---|---------------|-------------|
| 34 | RAYSHAWN LIGON, aka DIRTY RAY, LEONARD COLE, aka SCOOTER | June 28, 2010 | 8:41 p.m. |
| 35 | RAYSHAWN LIGON, aka DIRTY RAY, RUBY SEAGRAVES | June 29, 2010 | 4:26 p.m. |
| 36 | RAYSHAWN LIGON, aka DIRTY RAY, WILLIAM EFFORD | June 29, 2010 | 8:43 p.m. |
| 37 | RAYSHAWN LIGON, aka DIRTY RAY, KYRON MARLIN | June 30, 2010 | 12:20 a.m. |
| 38 | RAYSHAWN LIGON, aka DIRTY RAY, LARRY NEAL | June 30, 2010 | 10:17 a.m. |
| 39 | RAYSHAWN LIGON, aka DIRTY RAY, STETSON WHITE, aka KT | July 1, 2010 | 8:23 p.m. |
| 40 | RAYSHAWN LIGON, aka DIRTY RAY, STETSON WHITE, aka KT | July 2, 2010 | 6:51 p.m. |
| 41 | RAYSHAWN LIGON, aka DIRTY RAY, EARL KING | July 2, 2010 | 8:23 p.m. |
| 42 | RAYSHAWN LIGON, aka DIRTY RAY, LEONARD YOUNG, aka SNOOP | July 6, 2010 | 2:46 p.m. |
| 43 | RAYSHAWN LIGON, aka DIRTY RAY, LARRY NEAL | July 7, 2010 | 1:23 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|---|---------------|-------------|
| 44 | RAYSHAWN LIGON, aka DIRTY RAY, DARNELL HAYNES, aka FU-FU | July 7, 2010 | 9:41 p.m. |
| 45 | RAYSHAWN LIGON, aka DIRTY RAY, STETSON WHITE, aka KT | July 8, 2010 | 12:07 a.m. |
| 46 | RAYSHAWN LIGON, aka DIRTY RAY, DARNELL HAYNES, aka FU-FU | July 8, 2010 | 12:11 a.m. |
| 47 | RAYSHAWN LIGON, aka DIRTY RAY, JASON MORGAN, aka BOOTY | July 8, 2010 | 12:17 a.m. |
| 48 | RAYSHAWN LIGON, aka DIRTY RAY, EARL KING | July 10, 2010 | 10:42 p.m. |
| 49 | RAYSHAWN LIGON, aka DIRTY RAY, DARNELL HAYNES, aka FU-FU | July 11, 2010 | 5:07 p.m. |
| 50 | RAYSHAWN LIGON, aka DIRTY RAY, LEONARD YOUNG, aka SNOOP | July 11, 2010 | 8:59 p.m. |
| 51 | RAYSHAWN LIGON, aka DIRTY RAY, EARL KING | July 12, 2010 | 1:01 p.m. |
| 52 | RAYSHAWN LIGON, aka DIRTY RAY, SHERTARRA CATRON, aka TT | July 12, 2010 | 10:19 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|--|---------------|-------------|
| 53 | RAYSHAWN LIGON, aka DIRTY RAY, DIVAUGHN LIGON, aka LOU | July 13, 2010 | 1:57 p.m. |
| 54 | RAYSHAWN LIGON, aka DIRTY RAY, SHERTARRA CATRON, aka TT | July 13, 2010 | 10:02 p.m. |
| 55 | RAYSHAWN LIGON, aka DIRTY RAY, PERRY AVERY, JR. | July 14, 2010 | 2:54 p.m. |
| 56 | RAYSHAWN LIGON, aka DIRTY RAY, VINCENT PRICE | July 15, 2010 | 2:28 p.m. |
| 57 | RAYSHAWN LIGON, aka DIRTY RAY, VINCENT PRICE | July 16, 2010 | 1:39 p.m. |
| 58 | RAYSHAWN LIGON, aka DIRTY RAY, NIAKENA K. HEARD, aka KENTAE | July 16, 2010 | 1:48 p.m. |
| 59 | RAYSHAWN LIGON, aka DIRTY RAY, NIAKENA K. HEARD, aka KENTAE | July 17, 2010 | 12:58 p.m. |
| 60 | RAYSHAWN LIGON, aka DIRTY RAY, TERENCE C. HESTER | July 17, 2010 | 2:14 p.m. |
| 61 | RAYSHAWN LIGON, aka DIRTY RAY, TERENCE C. HESTER | July 17, 2010 | 4:12 p.m. |
| 62 | RAYSHAWN LIGON, aka DIRTY RAY, JAMEL McHANEY, aka GANGSTER NATE | July 17, 2010 | 5:46 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|--|---------------|-------------|
| 63 | RAYSHAWN LIGON, aka DIRTY RAY, BRAULIO DIAZ, aka TONY | July 17, 2010 | 5:48 p.m. |
| 64 | RAYSHAWN LIGON, aka DIRTY RAY, VINCENT PRICE | July 18, 2010 | 6:36 p.m. |
| 65 | RAYSHAWN LIGON, aka DIRTY RAY, RICARDO BRASHERS, aka RICO | July 18, 2010 | 9:09 p.m. |
| 66 | RAYSHAWN LIGON, aka DIRTY RAY, TERENCE C. HESTER | July 18, 2010 | 9:41 p.m. |
| 67 | RAYSHAWN LIGON, aka DIRTY RAY, TEKORA MADDEN, aka TK | July 19, 2010 | 7:52 p.m. |
| 68 | RAYSHAWN LIGON, aka DIRTY RAY, KYRON MARLIN | July 20, 2010 | 12:52 p.m. |
| 69 | RAYSHAWN LIGON, aka DIRTY RAY, TEKORA MADDEN, aka TK | July 20, 2010 | 3:45 p.m. |
| 70 | RAYSHAWN LIGON, aka DIRTY RAY, BRAULIO DIAZ, aka TONY | July 20, 2010 | 5:09 p.m. |
| 71 | RAYSHAWN LIGON, aka DIRTY RAY, RICARDO BRASHERS, aka RICO | July 20, 2010 | 7:45 p.m. |
| 72 | RAYSHAWN LIGON, aka DIRTY RAY, KYRON MARLIN | July 22, 2010 | 2:38 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|---|----------------|-------------|
| 73 | RAYSHAWN LIGON, aka DIRTY RAY, NIAKENA K. HEARD, aka KENTAE | July 22, 2010 | 7:44 p.m. |
| 74 | RAYSHAWN LIGON, aka DIRTY RAY, DIVAUGHN LIGON, aka LOU | July 23, 2010 | 7:46 p.m. |
| 75 | RAYSHAWN LIGON, aka DIRTY RAY, TEKORA MADDEN, aka TK | July 27, 2010 | 12:29 p.m. |
| 76 | RAYSHAWN LIGON, aka DIRTY RAY, DIVAUGHN LIGON, aka LOU | July 27, 2010 | 6:07 p.m. |
| 77 | RAYSHAWN LIGON, aka DIRTY RAY, TRAVON WILLIAMS, aka LITTLE D | July 29, 2010 | 10:48 a.m. |
| 78 | RAYSHAWN LIGON, aka DIRTY RAY, TEKORA MADDEN, aka TK | August 3, 2010 | 2:09 p.m. |
| 79 | RAYSHAWN LIGON, aka DIRTY RAY, LEONARD YOUNG, aka SNOOP | August 3, 2010 | 8:43 p.m. |
| 80 | LARRY NEAL, BRAULIO DIAZ, aka TONY | August 5, 2010 | 4:59 p.m. |
| 81 | LARRY NEAL, ERNEST HARRIS | August 5, 2010 | 5:16 p.m. |
| 82 | RAYSHAWN LIGON, aka DIRTY RAY, TRAVON WILLIAMS, aka LITTLE D | August 6, 2010 | 1:55 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|---|-----------------|-------------|
| 83 | LARRY NEAL, BRAULIO DIAZ, aka TONY | August 6, 2010 | 9:02 p.m. |
| 84 | RAYSHAWN LIGON, aka DIRTY RAY, TRAVON WILLIAMS, aka LITTLE D | August 7, 2010 | 11:20 a.m. |
| 85 | LARRY NEAL, ERNEST HARRIS | August 7, 2010 | 5:44 p.m. |
| 86 | RAYSHAWN LIGON, aka DIRTY RAY, PERRY AVERY, JR. | August 9, 2010 | 2:39 p.m. |
| 87 | RAYSHAWN LIGON, aka DIRTY RAY, JAMEL McHANEY aka GANGSTER NATE | August 9, 2010 | 7:53 p.m. |
| 88 | LARRY NEAL, DONTOYE KEVIN FEELINGS, aka TYRONE DION PATRICK, aka ANTHONY | August 10, 2010 | 11:19 a.m. |
| 89 | RAYSHAWN LIGON, aka DIRTY RAY, JAMEL McHANEY aka GANGSTER NATE | August 10, 2010 | 12:15 p.m. |
| 90 | LARRY NEAL, ERNEST HARRIS | August 12, 2010 | 2:46 p.m. |
| 91 | LARRY NEAL, DONTOYE KEVIN FEELINGS, aka TYRONE DION PATRICK, aka ANTHONY | August 13, 2010 | 2:51 p.m. |
| 92 | LARRY NEAL, DONTOYE KEVIN FEELINGS, aka TYRONE DION PATRICK, aka ANTHONY | August 14, 2010 | 3:10 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|---|-----------------|-------------|
| 93 | RAYSHAWN LIGON, aka DIRTY RAY, TRAVON WILLIAMS, aka LITTLE D | August 14, 2010 | 6:47 p.m. |
| 94 | LARRY NEAL, ERNEST HARRIS | August 15, 2010 | 3:07 p.m. |
| 95 | LARRY NEAL, DONTOYE KEVIN FEELINGS, aka TYRONE DION PATRICK, aka ANTHONY | August 17, 2010 | 1:36 p.m. |
| 96 | LARRY NEAL, ERNEST HARRIS | August 17, 2010 | 8:04 p.m. |
| 97 | RAYSHAWN LIGON, aka DIRTY RAY, JULIUS CARSON, JR., aka OG | August 18, 2010 | 11:12 a.m. |
| 98 | LARRY NEAL, BRAULIO DIAZ, aka TONY | August 18, 2010 | 11:18 a.m. |
| 99 | LARRY NEAL, DONTOYE KEVIN FEELINGS, aka TYRONE DION PATRICK, aka ANTHONY | August 19, 2010 | 11:52 a.m. |
| 100 | RAYSHAWN LIGON, aka DIRTY RAY, IVAN HARRIS, aka MICHAEL FANNIN | August 20, 2010 | 5:55 p.m. |
| 101 | LARRY NEAL, DONTOYE KEVIN FEELINGS, aka TYRONE DION PATRICK, aka ANTHONY | August 20, 2010 | 7:22 p.m. |
| 102 | RAYSHAWN LIGON, aka DIRTY RAY, IVAN HARRIS aka MICHAEL FANNIN | August 21, 2010 | 5:22 p.m. |

| <u>Count</u> | <u>Defendant(s)</u> | <u>Date</u> | <u>Time</u> |
|--------------|---|-----------------|-------------|
| 103 | RAYSHAWN LIGON, aka DIRTY RAY, IVAN HARRIS aka MICHAEL FANNIN | August 27, 2010 | 7:30 p.m. |
| 104 | RAYSHAWN LIGON, aka DIRTY RAY, IVAN HARRIS, aka MICHAEL FANNIN | August 30, 2010 | 12:23 p.m. |
| 105 | RAYSHAWN LIGON, aka DIRTY RAY, RICARDO BRASHERS, aka RICO | August 30, 2010 | 9:59 p.m. |
| 106 | RAYSHAWN LIGON, aka DIRTY RAY, IVAN HARRIS, aka MICHAEL FANNIN | August 31, 2010 | 6:49 p.m. |

All in violation of Title 21, United States Code, Section 843(b) .

COUNT 107

The Grand Jury further charges:

On or about July 15, 2010, in the Northern District of Ohio, Eastern Division, LARRY NEAL and BRAULIO DIAZ, aka TONY, did travel in interstate commerce between the State of Ohio and the State of Illinois, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said LARRY NEAL

and BRAULIO DIAZ thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 108

The Grand Jury further charges:

On or about July 24, 2010, in the Northern District of Ohio, Eastern Division, RAYSHAWN LIGON, aka DIRTY RAY, and JULIUS CARSON, JR., aka OG, did travel in interstate commerce between the State of Ohio and the State of Illinois, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said RAYSHAWN LIGON and JULIUS CARSON, JR., thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 109

The Grand Jury further charges:

On or about September 6, 2010, in the Northern District of Ohio, Eastern Division, LARRY NEAL did travel in interstate commerce between the State of Ohio and the State of Illinois, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said LARRY NEAL, thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 110

The Grand Jury further charges:

On or about November 4, 2010, in the Northern District of Ohio, Eastern Division, STETSON WHITE, aka KT, did knowingly and intentionally distribute approximately .8 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I

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controlled substance, in violation of Title 21, United States
Code, Sections 841(a)(1) and (b)(1)(C).

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts,
pursuant to the E-Government Act of 2002.